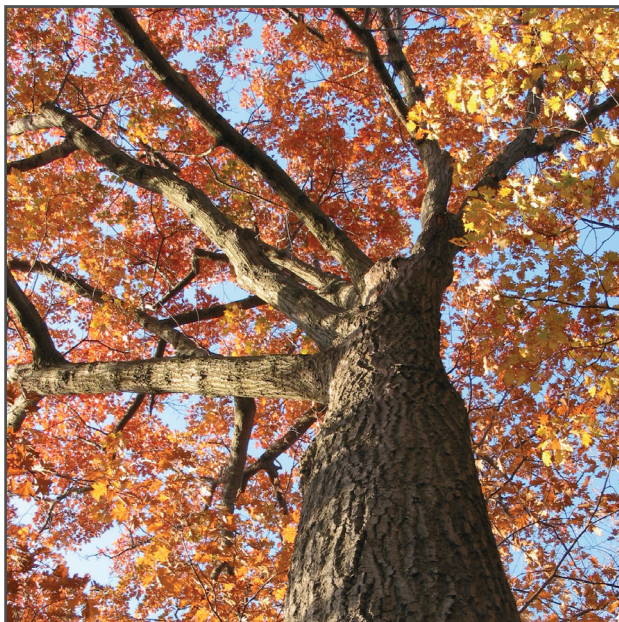


CHAPTER 5 - ENVIRONMENTAL IMPACT ASSESSMENT

The Environmental Impact Assessment Process	83	Difficulties and Limitations	95
Pre-Application Advice	83	Scoping	95
The need for Environmental Impact Assessment - EIA Screening	84	References	96
Scoping the Environmental Impact Assessment	85		
Other Consultations	86		
Public Consultation	86		
Approach to Environmental Impact Assessment	88		
Purpose	88		
Scope of the EIA	88		
Environmental Impact Assessment Team	89		
Structure of Environmental Statement	90		
Methodologies and Guidance	91		
Study Area	94		

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THE ENVIRONMENTAL IMPACT ASSESSMENT PROCESS

Pre-Application Advice

5.1 The first formal consultation with Ashford Borough Council, as noted in **Chapter 3 - Site Selection and Design**, was seeking pre-application advice on the principle of development

at the identified site location and potential requirements for further assessments and statutory bodies to consult.

5.2 A copy of the pre-application correspondence is provided at **Appendix 5.1 (ES Volume 2b)**. The Planning Officer's report (Ref. 21/00183/PRE) states:

'Having regard to the Development Plan and the NPPF, it is considered that the proposed development is acceptable in principle, subject to compliance with the other relevant Development Plan policies'.

5.3 In addition, the following pre-application advice was provided:

- the proposed development would be primarily considered against the criteria set out in policy ENV10 of the Local Plan;
- agreement with the proposed scope of assessment in relation to flood risk, Agricultural Land Classification (ALC), ecology and amenity;
- with regards to landscape and visual impacts, the proposal would be policy compliant subject

to demonstration that it would have no detrimental impact on the rural setting of the site following appropriate mitigation;

- in accordance with policy ENV10, evidence should be submitted to demonstrate that any mitigation screening and landscaping is in keeping with the character of the landscape and the rural setting;
- the submission of a Construction Management and Maintenance Plan is recommended;
- in accordance with policy ENV10 and the NPPF, the proposal should safeguard features of nature conservation interest and minimise impacts on biodiversity;
- an up to date Phase 1 Ecological Survey should accompany the application, together with subsequent survey work where appropriate; and
- measures should be introduced to achieve net gains in biodiversity and improve the value of the site.

The need for Environmental Impact Assessment - EIA Screening

- 5.4 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require that certain types of development must be subject to environmental impact assessment (EIA). The types of development listed in Schedule 1 of the regulations must be subject to EIA, whilst those in Schedule 2 will only require this if they are likely to give rise to significant environmental effects. If an ES is not volunteered, then a local planning authority should screen the proposal to consider whether EIA is required. The appropriate scope of an ES is determined through the Scoping exercise.
- 5.5 Under these regulations the proposed East Stour Solar Farm is not classed as 'Schedule 1' development, for which all proposals will require an EIA. As such, a criteria based approach is used to determine if 'Schedule 2' development requires EIA.
- 5.6 At Schedule 2, Part 3 (a), the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, defines what is classified as Schedule 2 development in relation to the proposed form of development.
- Column 1 - Description of development: *'(a) Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1);'*
- Column 2 - Applicable thresholds and criteria: *'The area of the development exceeds 0.5 hectare.'*
- 5.7 A Screening Request was submitted to Ashford Borough Council in July 2021. The report provided details of the proposed development and presented the screening process to be followed in line with the EIA Regulations. In addition, the Screening Request detailed the scope of works anticipated for the project and the guidance to be followed for each discipline.
- 5.8 The Screening Opinion was provided on 31st August 2021 and stated that an EIA would be required due to potential significant effects on nearby heritage assets (including St Martin's Churchyard and the Aldington Conservation Area) and potential cumulative impacts with the adjacent Sellindge Solar Farm. Landscape and visual impact, heritage impact and impacts upon wildlife habitats and ecology were highlighted as the main issues for consideration.
- 5.9 The Screening Opinion stated that the *'information to be included in the Environmental Statement can be found at Schedule 4 of the 2017 Regulations'*. No specific reference was made to our proposed scope of works or associated guidance. A copy of the Screening documents is provided at **Appendix 5.2**.
- 5.10 A Scoping Report was subsequently submitted to the Local Authority. The details of this Scoping Process are provided from **Paragraph 5.12 on page 85**.
- 5.11 This Environmental Statement has been prepared by a team of professional environmental assessors (see from **Paragraph 5.39 on page 89** for further details), following an Environmental Impact Assessment (EIA) carried out under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Scoping the Environmental Impact Assessment

Process

- 5.12 A formal request for a Scoping Opinion was submitted to Ashford Borough Council on 12th October 2021. The Scoping Report is provided within **Appendix 5.3**.
- 5.13 The Scoping Report aimed to clearly and concisely identify the key issues to be addressed within the Environmental Impact Assessment and subsequent Environmental Statement for the proposed East Stour Solar Farm.
- 5.14 The Scoping Report outlined issues arising from the development that were identified as having potential to cause significant effects. It also outlined the works commissioned to date and initial consultations undertaken by the Developer, prior to Environmental Impact Assessment commencing. In summary, the Scoping Report included:
- details of the site and proposal;
 - EIA legislation and the scoping process;

- EIA process and the general approach to be taken for East Stour Solar Farm;
- Topics to be assessed within the EIA, including:
 - Pre-application Consultation;
 - Agricultural Land Classification;
 - Traffic and Transport;
 - Hydrology, Hydrogeology and Flood Risk;
 - Ecology and Ornithology;
 - Cultural Heritage and Historic Environment;
 - Landscape and Visual Assessment;
 - Noise;
 - Glint and Glare;
 - Socio-economics;
 - Cumulative Impacts;
 - Planning Policy; and
- proposed format of the Environmental Statement (ES) and planning submission.

Scoping Opinion

- 5.15 As of January 2022, a Scoping Opinion from Ashford Borough Council is yet to be issued. As such, this Environmental Statement has been prepared following the approach proposed in the Screening and Scoping Reports, and in line with advice received through the Pre-Application and Screening responses.
- 5.16 The environmental assessments have been undertaken following well-established guidance in order to meet the requirements of Schedule 4 of the Town and Country Planning EIA Regulations 2017 and the appropriate Development Plan policies, including policy ENV10.

Other Consultations

- 5.17 In addition to the formal Pre-Application advice noted from **Paragraph 5.1 on page 83**, pre-application discussions were undertaken with Ashford Borough Council and Kent Downs AONB regarding the selection of viewpoints for detailed analysis within the LVIA. Details of the proposed public consultation activities planned were also provided and comment sought. Copies of correspondence are provided at **Appendix 5.4**. Further details of viewpoint selection are provided in **Chapter 11 - LVIA**.
- 5.18 Further consultation which has been undertaken with consultees following project screening is summarised within the relevant specialist chapters of this Environmental Statement. This includes but is not limited to:
- Network Rail;
 - Kent County Highways Authority; and
 - the Environment Agency.

Public Consultation

- 5.19 Community Engagement for the East Stour Solar Farm has been coordinated and led by SEC Newgate Limited. The following paragraphs are a brief summary of the public consultations that have taken place. The full report, including public feedback and copies of consultation material, is provided at **Appendix 5.5**.
- 5.20 EDF Renewables has carried out a full programme of community consultation in support of its proposals for East Stour Solar Farm in line with Ashford Borough Council's Statement of Community Involvement (SCI) and the tenets of the Localism Act 2011. This section explains the public consultation that has been carried out in relation to this application.
- 5.21 In line with Ashford Borough Council's guidance, as set out in its SCI and its Planning Guidance Note on large scale solar arrays (2013), the Applicant has consulted with the local community and stakeholders across two rounds of public consultation. These public consultations have taken account of the ongoing Covid-19 pandemic and guidance provided

by the Government. The first round of consultation during summer 2021 was carried out remotely with a limited number of small, in-person meetings. The second round of consultation in winter 2021 adopted a mix of in-person events and information made available online through a virtual public exhibition.

- 5.22 To ensure that the public could take part in the consultation, the Applicant wrote to over 2 800 addresses in the area around the proposed Scheme (**Plate 5.1 on page 87**) at the outset of each consultation to provide information on the proposals and to set out how those with an interest can take part in the consultation. Each newsletter directed interested parties to view a virtual exhibition available through the Applicant's website (www.edf-re.uk/renewables/east-stour). A hard copy questionnaire was made available with the newsletter and hard copies of the virtual exhibition and maps were made available on request through a dedicated Freephone information line and Freepost address.
- 5.23 The Applicant has also met with close site neighbours, local parish councils and councillors during both rounds of

consultation. These discussions have helped to shape the Scheme design as submitted. This has included meetings with Aldington and Bonnington Parish Council, Smeeth and Brabourne parish councils, Sellindge Parish Council and Otterpool Park LLP.

5.24 During the second round of consultation, the Applicant held public exhibition events at Aldington Village Hall and Brabourne and Smeeth Village Hall. These events were attended by over 70 people in total.

5.25 The Applicant received 415 individual pieces of feedback over the two consultations: 254 during the first round of consultation, and 161 during the second. The feedback received has played an important part in shaping the Scheme design, as set out within this document.

5.26 **Table 5.1** sets out the response to the feedback form question “Are you supportive of East Stour Solar Farm?”

First Consultation Round (August 2021)	
Response	Frequency
Yes	127 (50.8%)
No	77 (30.8%)
Unsure	43 (17.2%)

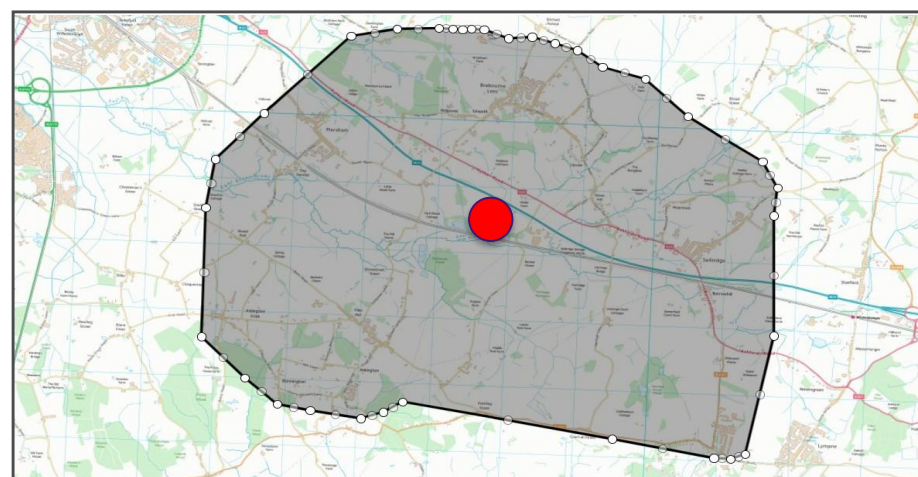
Second Consultation Round (November 2021)	
Response	Frequency
Yes	93 (59.2%)
No	15 (9.6%)
Unsure	48 (30.6%)

Table 5.1 - Response to Question “Are you supportive of East Stour Solar Farm?”

5.28 The most common themes to emerge through each round of consultation

was concern at the potential loss of agricultural land, general support for the proposals, concern for the potential impact of the proposals on wildlife, concern at the Scheme’s visual impact and suggestions that other forms of renewable energy would be superior to the proposed Scheme. Full details are provided in **Appendix 5.5**.

5.29 The Applicant will continue to engage with the local community through the planning process.



Consultation zone



Site Location (northern area)

Plate 5.1 - Public Consultation Zone (extract from **Appendix 5.5**)

APPROACH TO ENVIRONMENTAL IMPACT ASSESSMENT

Purpose

- 5.30 The purpose of Environmental Impact Assessment (EIA) and requirement for reporting in an Environmental Statement (ES) is summarised by the Ministry of Housing, Communities and Local Government National Planning Practice Guidance (MHCLG, 2020):

'The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.' Paragraph Reference ID: 4-002-20140306.

'The Environmental Statement must contain the information specified in regulation 18(3) and must meet the requirements of regulation 18(4). It must also include any additional information specified in Schedule 4 to the 2017

Regulations which is relevant to the specific characteristics of the particular development or type of development and to the environmental features likely to be significantly affected.' Paragraph Reference ID: 4-035-20170728.

- 5.31 With this in mind, and having regard to requirements of Schedule 4 of the EIA Regulations, the Environmental Statement focuses upon those effects which are likely to be significant. The Environmental Statement aims to:
- obtain baseline information for the study area to identify those features that may be impacted upon by the development;
 - identify and assess likely significant effects;
 - identify those features of the development where environmental impacts can be avoided, and environmental benefits achieved, through careful consideration of design, construction, operational and decommissioning methodologies and through mitigation inherent within the site design; and
 - with mitigation measures in place, assess the residual impacts of the development proposal.

Scope of the EIA

Issues Not Considered Further in EIA

- 5.32 The NPPF (MHCLG, 2021), NPPG (MHCLG, 2020), NPS EN-1 (DECC, 2011a) and EN-3 (DECC, 2011b) are material planning considerations in the determination of planning applications. These policy and guidance documents help direct the scope of work for Environmental Impact Assessment for renewable energy planning applications. This scope was used to inform the Scoping Report which was submitted to Ashford Borough Council (as discussed from **Paragraph 5.12 on page 85**).
- 5.33 Other issues may not require further examination in the Environmental Impact Assessments for individual proposals. These issues are explained in the following paragraphs, but are not necessary to be considered any further within the East Stour Solar Farm Environmental Impact Assessment or this Environmental Statement (ES).

CONSIDERATION OF ALTERNATIVES

- 5.34 The National Planning Policy Framework (MHCLG, 2021) at Paragraph 158 describes how it is not necessary for applicants of renewable or low carbon energy to demonstrate the overall need for such projects. The site selection and evolution process is detailed at **Chapter 3 - Site Selection and Design** but there is no further consideration of ranking of potential alternative sites or any form of sequential testing, as this is not appropriate nor in accordance with Government Planning Policy and Guidance for the proposed form of development. The Ashford Borough Council Brownfield Register records no sites of more than 7.7ha, considerably less than the required land area and so greenfield land was progressed. Throughout the Environmental Impact Assessment and site design process consideration was given to alternative panel heights and separations from features within and in proximity to the site boundary, as well as impact avoidance and mitigation.
- 5.35 Renewable energy projects such as the proposed project have a valuable role to play in offsetting emissions

contributing to climate change. The 'do nothing' scenario is therefore considered in the round within **Chapter 2 - Development Rationale** with respect to climate change. The benefits of solar farms are not just in abating climate change, but in producing domestic energy that is competitive in pricing with fossil fuels. Also with the proposed development there are substantial landscape and biodiversity enhancements which contribute to mitigating the ecological emergency.

- 5.36 Consideration of alternatives is therefore not considered further within individual chapters.

CONTAMINATED LAND

- 5.37 Desktop research identified that past and present land uses do not offer potential for contamination to be present on site. Therefore further investigation with respect to contaminated land is not considered necessary at the proposed site, and the matter is not discussed further in this ES.

Environmental Impact Assessment Team

- 5.38 The Applicant appointed a specialist team to undertake the Environmental Impact Assessment and to produce the subsequent Environmental Statement.
- 5.39 The principal project manager for the Environmental Impact Assessment is Engena. Engena is an independent renewable energy planning consultancy with 16-years and over a thousand Megawatts of development experience in the UK energy industry.
- 5.40 The company specialises in the design and development of renewable energy projects and provides support and management of all associated aspects, from site feasibility assessment through to layout design and the co-ordination of environmental impact assessments and planning applications.
- 5.41 For specific activities, such as landscape and visual and noise assessments, Engena employs independent established specialists with an expert knowledge of the appropriate standards and

methodologies required for Environmental Impact Assessment (EIA) and an understanding of the potential impacts associated with solar farm developments.

5.42 The independent specialists, each established in their field, who form the Environmental Impact Assessment team with Engena are:

- Wallingford Hydrosolutions (WHS) - Hydrology and Hydrogeology
- Turnstone Ecology Limited - Ecology and Ornithology;
- Viento Environmental Limited - Landscape and Visual Impact Assessment (LVIA);
- Orion Heritage Limited - Archaeology and Cultural Heritage Assessment;
- Ion Acoustic Limited – Noise; and
- Neo Environmental Limited - Glint and Glare.

5.43 The specialist assessments and their associated chapters have been authored in their entirety by the relevant consultants.

5.44 In addition, the following specialist consultants have been employed

to provide background reports and analysis to inform the relevant Environmental Statement chapters:

- Daniel Baird Associates - Agricultural Land Classification Survey;
- sec Newgate - Public Engagement and consultation;
- Traffic Services UK Limited - Automatic Traffic Count; and
- Magnitude Surveys Limited - Geophysical Survey for Archaeological Assessment.

5.45 The relevant qualifications and experience of the development team is provided in **Appendix 5.6**.

Structure of Environmental Statement

5.46 The findings of the Environmental Impact Assessment are presented within this four-volume Environmental Statement consisting of:

- Volume 1: Non-Technical Summary – Summarising the proposal and key significant issues and findings, in a format which is easily

accessible to a non-technical audience;

- Volume 2A: Written Statement - The detailed Environmental Statement, containing the independent specialist assessments, proposed mitigation and predicted residual impacts;
- Volume 2B: Appendices - Containing the background research, surveys and assessments to the Written Statement;
- Volume 3: Figures - An A3 format document containing the site layout figures, construction figures and figures accompanying the chapter specific assessments; and
- Volume 4: Visualisations - A large format document presenting the visualisations referred to in the Landscape and Visual Impact Assessment within the Written Statement.

5.47 In addition to the four-volume, five part, Environmental Statement the Applicant has also submitted a Design and Access Statement and Planning Statement.

5.48 Whilst not forming part of the Environmental Statement, the Planning Statement is a key document within the overall submission summarising the National, County and Local policy context relevant to the development, including the identified need for solar energy. The document analyses the proposed development against these policies and the need to determine the acceptability of the development at this location.

5.49 Electronic copies of the Environmental Statement have been submitted to Ashford Borough Council, where the document will be available for public viewing. Electronic copies of the Environmental Statement are also available on the project website (<https://www.edf-re.uk/renewables/east-stour>).

Methodologies and Guidance

5.50 The Environmental Impact Assessment and subsequent Environmental Statement have been produced according to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, following the identified scope set out in the Scoping Report.

5.51 Throughout, general guidance has also been used from the following documents:

- National Planning Policy Framework, MHCLG, 2021;
- National Planning Practice Guidance, MHCLG, 2020;
- Overarching National Policy Statement for Energy (EN-1), 2011a;
- National Policy Statement for Renewable Energy Infrastructure (EN-3), 2011b; and
- Ashford Local Plan 2030.

5.52 Individual specialist sections of the assessment and subsequent chapters have been prepared according to the relevant standards and methodologies pertinent to each section. Standards and methodologies referenced are detailed by topic below and discussed in each chapter. Further references may be available in individual chapters to research papers and site specific resources, where appropriate.

Specific Standards and Methods

CHAPTER 3 - SITE SELECTION

- Building Research Establishment (BRE) Planning guidance for the development of large scale ground mounted solar PV systems (2014);
- BRE Agricultural Good Practice Guidance for Solar Farms (2014);
- BRE National Solar Centre Biodiversity Guidance for Solar Developments (2014);
- Department of Energy and Climate Change UK Solar PV Strategy Part 2 (2014);
- Natural England Technical Information Note TIN101 - Solar parks: maximising environmental benefits (2011); and
- Natural England Technical Information Note TIN049 Edition 2 - Agricultural Land Classification: Protecting the best and most versatile agricultural land (2012).

CHAPTER 4 - EXISTING CONDITIONS (AGRICULTURAL LAND CLASSIFICATION)

- Ministry of Agriculture Fisheries and Food, Agricultural Land Classification of England and Wales: Revised guidelines and criteria for grading the quality of agricultural land (1988); and
- Natural England Technical Information Note TIN049 Edition 2 - Agricultural Land Classification: Protecting the best and most versatile agricultural land (2012).

CHAPTER 8 - TRAFFIC AND TRANSPORT

- Department for Transport, Manual for Streets (2007);
- Department for Transport Circular 02/2013;
- Highways England et al. Design Manual for Roads and Bridges (2020); and
- Institute of Environmental Management and Assessment, Guidelines for the Environmental Assessment of Road Traffic, 1993.

CHAPTER 9 - HYDROLOGY AND HYDROGEOLOGY

- CIEEM Guidelines for Ecological Impact Assessment in the UK and Ireland (2018);
- CIRIA SUDS Manual (2015); and
- Environment Agency Flood Risk Assessments (2022).

CHAPTER 10 - ECOLOGY

- BS42020:2013 – Biodiversity Code of practice for planning and development (2013);
- CIEEM Guidelines (2019);
- BTO Common Bird Census Methodology and Breeding Bird Survey Techniques;
- Conservation of Habitats and Species Regulations (2017);
- Countryside and Rights of Way Act (CROW) (2000);
- IEEM, Guidelines for Ecological Impact Assessment in the United Kingdom (2018);
- JNCC, A Handbook for Phase 1 Habitat Survey, 2nd edition (2016);

- Natural Environment and Rural Communities Act (NERC) (2006);
- The Kent and Medway Biodiversity Action Plan; and
- Wildlife and Countryside Act (1981) (as amended).

CHAPTER 11 - LANDSCAPE AND VISUAL IMPACT ASSESSMENT

- Ashford Borough Council landscape character assessments (2005 and 2009);
- Guidelines for Landscape and Visual Impact Assessment; 3rd Edition; The Institute of Environmental Management and Assessment and the Landscape Institute (2013);
- Kent Downs AONB Landscape Character Assessment (unpublished);
- The Landscape Assessment of Kent (2004);
- Natural England Landscape Character Profiles;
- Natural England, An Approach to Landscape Character Assessment (2014); and

- Visual Representation of Development Proposals (LI Advice Note 06/19).

CHAPTER 12 - CULTURAL HERITAGE AND ARCHAEOLOGY

- Ancient Monuments & Archaeological Areas Act (1979);
- Chartered Institute for Archaeologists, Standards and guidance for archaeological geophysical survey (2020);
- English Heritage, Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008);
- English Heritage, Seeing the History in the View: A Method for Assessing Heritage Significance within Views (2011);
- Historic England, Historic Environment Good Practice Advice In Planning, Note 2, Managing Significance in Decision-Taking in the Historic Environment (2015);
- Historic England, Historic Environment Good Practice Advice In Planning Note 3: The

Setting of Heritage Assets (2017); and

- Planning (Listed Building and Conservation Areas) Act (1990).

CHAPTER 13 - NOISE

- BS5228 'Code of practice for noise and vibration control on construction and open sites Part 1: Noise +A1:2014 (2014);
- BS4142: 2014+A1:2019 'Methods for rating and assessing industrial and commercial sound (2019);
- Control of Pollution Act (CoPA) (1974);
- Defra, Noise Policy Statement for England (NPSE) (2010);
- Environmental Protection Act (EPA);
- Highways England et al. Design Manual for Roads and Bridges (2020);
- IEMA (Institute of Environmental Management and Assessment) Guidelines for Environmental Noise Impact Assessment (2014); and

- Department of Transport and Welsh Office, Technical Memorandum, Calculation of Road Traffic Noise (CRTN) (1988).

CHAPTER 14 - GLINT AND GLARE

- CAA, Interim CAA Guidance – Solar Photovoltaic Systems (2010);
- CAA, Air Navigation: The Order and Regulations (2015);
- BRE Planning Guidance for the Development of Large Scale Ground Mounted Solar PV Systems (2013); and
- US Federal Aviation Administration (FAA), Technical Guidance for Evaluating Selected Solar Technologies on Airports (2010).

5.53 The process employed throughout the assessments has been developed to ensure a rigorous assessment and is outlined below:

- establishment of methodologies – in accordance with the relevant standards and published guidance detailed from **Paragraph 5.50 on page 91** and the relevant Planning Policies;

- identification of baseline conditions both of the site and the surrounding study area where appropriate. This includes for the sensitivity of the receptors which may be affected through changes in baseline conditions;
- assessment of predicted impacts and their significance;
- identification of mitigation measures where appropriate; and
- identification and assessment of residual impacts following implementation of mitigation measures.

5.54 The Environmental Statement as a whole follows the same format with a summary of mitigation measures and residual impacts at the end of the document.

Study Area

5.55 As stated at **Paragraph 5.30 on page 88**, the Environmental Statement should focus upon potential significant effects to the baseline environment. With this in mind the study area was selected in order to allow studies to focus on significant effects.

5.56 Whilst each discipline will require a bespoke study area, the principal assessment which informs the establishment of the study area is the Landscape and Visual Impact Assessment (**Chapter 11**).

5.57 Following the generation of the Zone of Theoretical Visibility (ZTV) for the Scoping Report, it was the professional opinion of the landscape architect, that a 5km radius study area would ensure adequate assessment of significant effects.

5.58 The Hydrology and Hydrogeology assessment (**Chapter 9**) predominantly focuses upon the area within the site boundary. However the impact that the proposal will have on the surrounding area is also considered.

5.59 The Ecological assessment (**Chapter 10**) considers the potential impacts upon ecological receptors and designations across and proximate to the site. Designated sites and species of conservation concern at a national, regional and local level have been reviewed through data search as discussed at **Chapter 4 - Existing Conditions**. Targeted species surveys covered the site area and an

appropriate buffer on an individual species basis.

5.60 The assessment of potential impacts on cultural heritage assets (**Chapter 12**) considers all designated heritage assets within a 1.0km study area.

5.61 There is no formal guidance with regard to the maximum distance at which noise or glint and glare should be assessed. Noise modelling of the proposed development at the proposed environment determines the study area to ensure standards are achieved at the nearest dwellings to the proposal. The Glint and Glare assessment, as reported in **Chapter 14**, uses the ZTV as the guide for the study area, which is limited to 1.0km for this discipline, and extended to 30km with respect to aerodromes.

5.62 With respect to other assessments the study area has concentrated on the development site.

DIFFICULTIES AND LIMITATIONS

Scoping

- 5.63 At the point of submission, a Scoping Opinion from Ashford Borough Council was yet to be received. However, the advice provided by the Planning Officer within the Pre-Application and Screening responses has been followed throughout the assessment process and in the preparation of this Environmental Statement as well as the scope as set out in the submitted Scoping Report (October 2021).

REFERENCES

Act of Parliament, 2017, Town and Country Planning (Environmental Impact Assessment) Regulations: Statutory Instrument 2017 no. 571, HMSO, UK.

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Ashford Borough Council, 2019, Ashford Local Plan 2030, Ashford Borough Council, UK.