



# The countryside charity Kent

28 June 2022

22/501335/FULL | Installation of a renewable energy led generating station comprising of ground-mounted solar arrays, associated electricity generation infrastructure and other ancillary equipment comprising of storage containers, access tracks, fencing, gates and CCTV together with the creation of woodland and biodiversity enhancements. | Land North Of Little Cheveney Farm Shephurst Lane Marden Kent

CPRE Maidstone wishes to object to this application based on the following considerations

## Location and Cumulative Impact

The site lies within the parish boundary of Marden. The rural landscape character of this area is already heavily compromised by

- A business park to the north of the village
- A solar installation to the south west of the village
- A large area under poly tunnels in Collier Street

A community like Marden needs employment areas such as the business park and the fruit farm. The suggested development will not contribute to meaningful job creation in the area. However consideration has to be given to the overall impact on the landscape and we consider that the addition of this solar installation leads to unacceptable levels of industrialisation of the already compromised rural landscape ( see Google view)

Policy DM 24 MBLP applies in so far as

- i. 'The cumulative impact of such a proposal in the local area' needs to be considered and weighs against the development.

## Visual Impact

A site with a 4000mm high security fence and structures ( 'barn') of 61000mm height and covering several acres cannot be overlooked. The suggested screening cannot screen the whole site when looked from a distance. In addition the most easterly section seeks to be completely unscreened and will impact very much on the setting of the houses in the area of Little Sheephurst Farm. We are not satisfied by the Glint and Glare Study which assess impact only on the ground floor of buildings in the vicinity.

We also want to raise the issue of possible glare for users of Sheephurst Lane. We don't think it is satisfactory that the glare impact on this minor road is not assessed ( as legally it doesn't have to be). The section adjoining the road seems to be unscreened.

Policy DM 24 MBLP applies in so far as

- ii. 'The landscape and visual impact of the development 'needs to be considered and weighs against the development.

## Public Footpaths

We acknowledge that KCC has indicated that the public footpaths KM 248/2 could be diverted and that two new permissive footpaths could be created. We question the amenity value of a footpath which leads along a 4000mm high security fence. We are also concerned about increased flooding of the footpath along the railway line.

Policy DM24 MBLP applies in so far as

- iv. 'The impact of proposals on the amenities of local residents...' needs to be considered and weighs against the proposal.

## Flooding

The site is subject to flooding once in 100 years. We were bemused that this was taken by the applicant as an argument for the site not being suitable for farming. We consider it more problematic to have an electricity generating plant and battery storage on land which is liable to flooding.

The site slopes gently towards the north and we are concerned about increased flooding along the footpath 248 along the railway. As we understand the railway already acts as a barrier for surface water to drain away.

The drainage plans don't envisage drainage channels for the photovoltaic structures themselves. The soil analysis carried out by the applicant shows that the soil is not permeable and is underlain by groundwater. Both factors together indicate to us that the water will pool along the base of the solar panels and eventually run off with the incline the land which is, as we understand, towards the railway line and the public footpath.

We consider the drainage strategy for this location under the specified soil conditions as unsatisfactory.

## Green energy

CPRE is committed to support the government in its net zero strategy.

We would like to comment on the applicant's line of argument for the advantages of solar energy generation instead of energy crop farming on this specific site. We don't share the view that the site is not suitable for energy crop as there are no local processing facilities. Such processing facilities are, especially as they can be integrated in existing farm complexes less visually intrusive than the suggested battery storage etc. on the site. They also don't need security fencing or diversion of foot paths. They allow the water to dissipate naturally and the fact that the site is badly drained might be an advantage for some energy crop.

The major issue about energy crop is that it competes with farming for food. This proposed installation however will completely take the land out of agricultural uses for many years to come. We don't think that this is a good idea in times of climate change and worldwide threat to food security (acute at the moment but also the long-term scenario due to climate change).

Our stance against this development is not a stance against solar energy but a stance for development in the right places. This is the wrong place.

CPRE nationally has asked government to change regulations in order to make it easier for PV panels to be sited on existing buildings, especially buildings with a large roof area such as industrial parks as it widely happens on the continent.

## Agricultural land classification

The land suggested for this development falls into the category 3a and even 2 of the best and most versatile agricultural land.

We would like to suggest that this application is refused as it doesn't follow NPPF 174 (b)

*Planning Policies and decisions should contribute to and enhance the natural and local environment by: ...*

*b) recognising the intrinsic character and beauty of the countryside. And the wider benefits from the natural capital and ecosystem services- including the other economic benefits of the most versatile agricultural land and of trees and woodland.*

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