

From: [Peta Grant](#)
To: [Planning Comments](#)
Subject: 22/501335/FULL Planning comment from WKPS
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[solar farm flood risk map.pdf](#)

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22/501335/FULL Land North of Little Cheveney Farm, Sheephurst Lane, Marden – 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.

WKPS objects to this application and raises the following concerns:

1. Scrutiny

WKPS considers that this application requires full scrutiny by the Council.

This application seeks consent to build a solar farm on 74.5 hectares of productive agricultural land in the countryside west of Marden. The proposed site is the size of 90 full-size football pitches. It is almost the size of Marden itself.

Plans are submitted to return the site to agriculture on or before 37 years. This would require the uplifting and recycling of a very large quantity of material – concrete, piles, buried cables, equipment, buildings, roads etc. In effect this application should be considered as a permanent change of use of this large area from farmland to manufacturing industry.

The application was accepted on 14 March 2022. Supporting statements are dated between January and March. At this time, three weeks after the invasion of Ukraine by Russia, the issue of National energy security was paramount. Now the second National issue of food security has come to the fore and on 13 June 2022 the Government published its Government Food Strategy. This should be addressed as an integral part of the application. This issue is a further reason for full review by the Council.

2. The Applicant

The application is by Statkraft, a Norwegian State-owned company with a long history of investing in renewable energy. The company has volume and profitability objectives.

The freeholder is Eckley Farms. Their objective in making the identified area of land available to Statkraft is diversification and to establish a secure source of income.

3. Policies

This proposal is not in the Development Plan. The application relies on National policies that support the Government commitment towards Net Zero. There should now be additional commentary on how this application responds to the new Government Food Strategy.

The NPPF has three overarching and interdependent objectives to achieve sustainable development, as follows:

Economic – to help build a strong responsive and competitive economy

Social – to support strong vibrant and healthy communities

Environmental – to contribute to protecting and enhancing our natural, built and historic environment.

The Environmental objective goes on to state, “including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution and mitigating and adapting to climate change, including moving to a low carbon economy”.

The requirement for “most compelling evidence” occurs whenever an exception is to be made to regular Planning decisions.

At the local level, the application is based on policies in the adopted Maidstone Borough Local Plan 2017. The proposal breaches three Strategic MBC policies that protect the Countryside. It relies on interpretation of the exception policy in the Plan that pertain to the installation of solar farms.

The three Strategic policies support tier seven – The Countryside – of MBC’s seven-tier Settlement Hierarchy. The three policies are used frequently to Refuse adverse development. Had this application been for anything other than a solar farm it would most probably have been Refused.

The policies contain the following texts:

SS1 – Spatial Strategy. This includes “...landscapes of local value will be conserved and enhanced”

SP17 – The Countryside, includes “...Development proposals will not be permitted unless they accord with other policies in the Plan and they will not result in harm and appearance of the area”

SP18 – The Historic Environment, includes “...management processes, securing the sensitive management and design of development which impacts on heritage assets and their settings”

The exception policy on which this solar farm application relies is DM 24: This requires assessment of the impact on landscape and views, on heritage assets, amenities of local residents, on transport, ecology and biodiversity and on the cumulative impact. Alternative sites and decommissioning must be addressed.

4. Heritage assets, landscape, views and amenities

The area surrounding the site is typical historic Wealden countryside. The beauty of the Weald is in its dispersal of small farms, hamlets and villages, small roads and multiple hedges. This landscape developed as a consequence of inheritance law in ancient medieval times. The Weald does not have big estates with parkland. The 33 listed buildings within 1km of the site are typical and are evidence of the Weald landscape.

Five of the listed houses are identified as being impacted by the development. The actual number is nine as Little Cheveney Farm actually contains five separately listed dwellings. The record should be corrected.

The applicant’s solution to hiding the development from view – the 2.4m fence, 5m CCTV masts and 7.5m high buildings – is to plant trees which will do the job after 10 years of growth. However, the applicant does not spell out that all Wealden trees are deciduous. So, in addition to the first 10 years, this industrial site will be visible during every winter.

The applicant’s Glint and Glaze report accepts that certain dwellings will be affected by reflection from the arrays and may affect the road. How can this be acceptable? Remedial action is required.

There is scepticism that the noise of the cooling fans will not be heard from the nearby dwellings. How can this issue be avoided?

The rectangular area that projects northwards from Little Cheveney Farm is in private ownership. It is parkland, planted with oaks at least 170 years old. Wealden parkland is rare. This parkland should be protected. If this application is approved WKPS strongly recommends that a complete line of arrays on both west and east side of the parkland, adjacent to the parkland, is removed from the plan This would give the same wide spacing around the parkland as is planned around the rectangular area to the west of Little Cheveney Farm that Eckley Farms is retaining in private ownership.

5. Flood Risk assessment

The planned area floods on the north-east corner of the site. The whole of the proposed area has flood risk – see

attached flood risk map Maidstone Rural West (South) with the site outlined in black.

It is reasonable to ask Statkraft to comment on how the site would cope with flooded arrays and/or buildings, and in particular the east storage building which is located next to the Lesser Tiese River.

The applicant's Flood Risk Assessment dated March 2022 has adopted a risk uplift of 35%, representing a higher-than-average risk of flooding through the year 2050. The conclusion is a low flood risk, and some mitigation is proposed. The planning officer might want to check for more recent Environment Agency advice on this uplift.

Run-off from the arrays is not considered to be of consequence, although neighbours need to be reassured on this point.

The Council may want assurances about any chemicals that may be used in maintenance of the arrays and about leakage from the arrays themselves.

It is to be expected that the various involved Water Authorities will be required to submit opinions.

6. Transport

Sheephurst Lane is narrow and twisty, unsuitable for HGV's. The Transport report seems to have been done from a desk; the routing of large vehicles through the twists and parked cars at the centre of Marden is not practical.

An alternative route to the site has been suggested by a local resident and this idea should be fully investigated and if necessary, replace the submitted report.

7. Ecology and Biodiversity

The applicant's plan clearly strives to reduce the adverse effect of the proposal on the significant natural features of the site. Whatever the calculations may say (as yet these new calculations are untested but are viewed with scepticism) there is clearly an adverse effect on the extensive wildlife in the short-term, if not the long term. It has also been pointed out that there is a greater diversity of wildlife than has been covered in the report.

In recent years much habitat and agricultural land has been lost to house building in Marden. EIA Screening Opinion was sought under 22/00068/ENVSCR for a solar farm on Land at Bockingfold Farm, Horsmonden in the Tunbridge Wells borough; this is of an equivalent size (78 hectares) and only a mile distant. It was determined that, as for this site, "the development is not deemed to be so significant to warrant an EIA". The cumulative environmental impact in the area must, therefore, be robustly addressed through the planning process.

8. Agricultural Land

Eckley Farms produces winter wheat, winter barley, oats, oilseed rape, beans and linseed and is principally an arable enterprise. The Agricultural Land Use Statement explains that land at the site is classified as Grade 2, and Subgrades 3a and 3b, with just under half of the site classified as grade 2 and subgrade 3a and falls into the category of 'Best and Most Versatile' (BMV) Land. BMV land is a finite national resource and is to be preserved to protect national food security. The NPPF states a preference for development on poor quality agricultural land. The proposal will remove this land from food production for at least 40 years. Whilst the site forms a small part of Eckley Farms landholding (7.5%), the cumulative loss of agricultural land to development of varying types across the nation's farms will eventually impact on food security.

9. Alternative Sites

The search for alternative sites was restricted to the area immediately adjacent to the overhead power line and only within the Maidstone Bough Council boundary. Research was not undertaken in any direction away from the powerline. This narrow corridor of research minimises the capital cost of the Statkraft investment and avoids delay to the project which would arise if connection to the grid was across a distance. This means that the Sequential Test fails to fulfil the legitimate requirements of a search. It should be done properly.

10. Decommissioning

The Decommissioning Plan is comprehensive, but it does not state who pays for this substantial year-long operation. This is presumably StatKraft. It must be stated in the application.

11. Community Survey

The shortfalls in the Community Survey as pointed out by residents, and the 80% rejection rate of the proposal, surely do not satisfy what is an important issue, whatever the decision of the Council. A more complete exercise should be undertaken.

12. Balancing National Energy Security against National Food Security

Solar farms appear attractive to resolving Energy security. From a pure CO2 emissions point-of-view they are better than coal and gas but they are worse than off-shore wind. The CO2 emissions index over the lifetime of investment is coal 1000, natural gas 450, solar farms 100, offshore wind 10. Hence the Government's recent drive for additional offshore wind and for nuclear energy baseload. There is no enthusiasm for any alternative except for flexible gas back-up for when the wind does not blow. Solar farms are now side-lined.

General:

Approval of this application would change 184 acres of productive farmland to a big manufacturing site, probably for ever, at the same time seriously damaging an area of classical Wealden landscape and heritage. The evidence presented so far for approval of this application is not complete nor is it up to date.

WKPS urges MBC to refuse this application.

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