

**Land north of Little Cheveney Farm, Sheephurst Lane, Marden, Kent
Core Document List**

1 Application/Appeal and Related Documents	
CD1.1	Amended Completed Application Form dated 20 May 2022
CD1.2	Application Drawings, comprising:
CD1.2.1	27899/053 Rev A - Proposed Solar Farm Footpath and Boundary Layout
CD1.2.2	Drawing SCUKX-SHEEP-000-100P PV Layout Overview Plan
CD1.2.3	Drawing AW0143-PL-0003 Proposed Mitigation, Landscape and Ecology Enhancements - with Appeal Amendments
CD1.2.4	[no longer used]
CD1.2.5	27899/150 Rev C - Site Location Plan
CD1.2.6	27899/051 Rev A - Aerial Site Location Plan
CD1.2.7	27899/011 Rev A - Timber Fence Elevations
CD1.2.8	21-0354 SP02-A - CTMP Plan Swept Path Analysis
CD1.2.9	21-0354 SP01-B - CTMP Plan Swept Path Analysis Primary Site Access
CD1.2.10	21-0354 SK03-A - CTMP Plan Construction Traffic Routing
CD1.2.11	21-0354 SK04 - CTMP Plan Proposed Site Compound
CD1.2.12	SKUKX-SHEEP-000-MCS 206 - CCTV Elevation
CD1.2.13	SKUKX-SHEEP-001-HVG 465 - Main Building Plant (HV Compound)
CD1.2.14	SKUKX-SHEEP-001-HVG 466 - Main Building Elevation (HV Compound)
CD1.2.15	SKUKX-SHEEP-000-HVG 104 - Monitoring Cabin
CD1.2.16	SKUKX-SHEEP-000-MCS 201 - Internal Tracks
CD1.2.17	SKUKX-SHEEP-000-MCS 203 - Perimeter Fence Detail
CD1.2.18	SKUKX-SHEEP-000-MCS 204 - Gate Elevation
CD1.2.19	SKUKX-SHEEP-000-MCS 205 - Solar Framework Elevation
CD1.2.20	SKUKX-SHEEP-000-MCS 252 - Transformation Station
CD1.2.21	SKUKX-SHEEP-000-MCS 253 - Edge of Park Switchgear Station
CD1.3	Heritage Desk Based Assessment dated January 2022
CD1.4	Solar Photovoltaic Glint and Glare dated January 2022

CD1.5	Grid Connection Assessment dated February 2022
CD1.6	Construction Method and Decommissioning Statement dated March 2022
CD1.7	Statement of Community Involvement dated March 2022
CD1.8	Sequential Analysis Study dated February 2022
CD1.9	Landscape and Visual Impact Assessment dated February 2022
CD1.10	Technical Note - Public Rights of Way Mitigation Strategy dated February 2022
CD1.11	Construction Traffic Management Plan dated February 2022
CD1.12	Flood Risk Assessment dated March 2022
CD1.13	Landscape and Ecological Management Plan with Biodiversity Net Gain Management and Monitoring Plan dated March 2022
CD1.14	Planning, Design and Access Statement dated March 2022
CD1.15	Agricultural Land Use Statement dated March 2022
CD1.16	Agricultural Land Classification and Soil Resources dated March 2022
CD1.17	Request for a Screening Opinion
CD1.18	Screening Request (reference 21/503277/ENVSCR) Screening Matrix
CD1.19	Screening Opinion Decision (reference 21/503277/ENVSCR) issued 5 July 2022
CD1.20	Letter from JBA Consulting to the Appellant dated 23 August 2022 attaching drawing no. IRA-JBAU-XX-XX-SK-C-0001 in response to the Environment Agency's consultation response
CD1.21	Letter from the Appellant to the Council dated 31 August 2022 [incorrectly dated 31 August 2021] amending the appeal and attaching new documents
CD1.22.1	Response to Comments and Objections dated August 2022
CD1.22.2	Utility Scale Solar Background Briefing dated August 2022
CD1.22.3	Detailed Response on Key Issues: Landscape, Noise, Glint and Glare, Construction Traffic Management, Heritage and Site Security dated August 2022
CD1.23	Letter to the Council dated 1 September 2022 attaching the revised Construction Traffic Management Plan dated August 2022
CD1.24	Planning Committee Report dated 20 October 2022
CD1.25	Update to the Planning Committee Report dated 20 October 2022
CD1.26	Decision Notice dated 28 October 2022 for planning application 22/501335/FULL
CD1.27	Minutes of the Planning Committee dated 20 October 2022
CD1.28	Grid Review Planning Report dated March 2023
CD1.29	Agricultural Appeal Statement dated April 2023

CD1.30	Ecological Response dated 19 April 2023
CD1.31	Updated Sequential Analysis Study dated 24 April 2023
CD1.32	Landscape Response to Appeal Scheme dated April 2023
CD1.33	Heritage Appeal Statement dated April 2023
CD1.34	a. Appeal Amendments Summary dated April 2023; and b. Drawing SCUKX-SHEEP-000-100P PV Layout Amendments.
CD1.35	Biodiversity Net Gain Assessment dated April 2023
CD1.36	Ecological Impact Assessment dated April 2023
CD1.37	Landscape and Visual Impact Addendum dated April 2023
CD1.38	Carbon Emissions Statement dated April 2023
CD1.39	Supplementary Noise Impact Assessment dated April 2023
CD1.40	Outline Surface Water Drainage Strategy dated April 2023
2 Consultation Responses	
CD2.1	Consultation Responses to Application Documentation, comprising APP2.1.1 to APP2.1.33:
CD2.1.1	Collier Street Parish Council
CD2.1.2	CPRE (28 June 2022)
CD2.1.3	Environment Agency (28 June 2022)
CD2.1.4	Environment Agency (22 September 2022)
CD2.1.5	High Weald AONB Unit (21 September 2022)
CD2.1.6	Historic England (17 June 2022)
CD2.1.7	Historic England (8 September 2022)
CD2.1.8	Kent County Council – Archaeology (10 August 2022)
CD2.1.9	Kent County Council – Ecological Advice (6 September 2022)
CD2.1.10	Kent County Council – Flood and Water Management (1 July 2022)
CD2.1.11	Kent County Council – Flood and Water Management (23 September 2022)
CD2.1.12	Kent County Council – Highways (11 July 2022)
CD2.1.13	Kent County Council – Highways (30 September 2022)
CD2.1.14	Kent County Council – Minerals and Waste (13 June 2022)
CD2.1.15	Kent County Council – Public Rights of Way and Access (14 June 2022)

CD2.1.16	Kent County Council – Public Rights of Way and Access (8 September 2022)
CD2.1.17	Kent Police (23 June 2022)
CD2.1.18	Kent Police (20 September 2022)
CD2.1.19	Maidstone Borough Council – Heritage and Design (10 August 2022)
CD2.1.20	Maidstone Borough Council – Heritage and Design (11 October 2022)
CD2.1.21	Marden Parish Council
CD2.1.22	Marden Parish Council (8 August 2022)
CD2.1.23	Maidstone Borough Council – Environmental Protection (1 July 2022)
CD2.1.24	Maidstone Borough Council – Environmental Protection (5 October 2022)
CD2.1.25	Natural England (20 July 2022)
CD2.1.26	Natural England (22 September 2022)
CD2.1.27	Network Rail (7 September 2022)
CD2.1.28	Network Rail (10 October 2022)
CD2.1.29	Southern Water (1 July 2022)
CD2.1.30	Southern Water (26 September 2022)
CD2.1.31	Upper Medway Internal Drainage Board (5 July 2022)
CD2.1.32	Upper Medway Internal Drainage Board (21 September 2022)
CD2.1.33	Weald of Kent Protection Society (4 July 2022)
CD2.1.34	Maidstone Borough Council – Landscape Officer (duplicate of CD2.1.20)
CD2.2	Third Party Representations (81 objections)
CD2.3	Third Party Representations submitted following appeal
CD2.4	Third Party Representations submitted following further consultation
3 The Development Plan, National Policy and Other Material Considerations	
CD3.1	Maidstone Borough Local Plan (adopted October 2017)
CD3.2	Maidstone Borough Council Local Plan Review (October 2021)
CD3.3	National Planning Policy Framework (updated September 2023)
CD3.4	National Planning Practice Guidance (online resource) http://planningguidance.planningportal.gov.uk/
CD3.5	Maidstone Borough Council Biodiversity Climate Change Strategy (October 2020)

CD3.6	Ten Point Plan for a Green Industrial Revolution (November 2020)
CD3.7	UK Energy White Paper: Powering our Net Zero Future (December 2020)
CD3.8	Net Zero Strategy: Build Back Greener (October 2021)
CD3.9	British Energy Security Strategy (April 2022)
CD3.10	Powering Up Britain (March 2023)
CD3.11	Procedural Guide: Planning appeals – England, updated 21 December 2022 (online resource) Procedural Guide: Planning appeals – England - GOV.UK (www.gov.uk)
CD3.12	Overarching National Policy Statement for Energy (EN-1) 2023
CD3.13	National Policy Statement for Renewable Energy Infrastructure (EN-3) 2023
CD3.14	Climate Change Committee Letter dated 28 June 2023
CD3.15	Maidstone Level 1 Strategic Flood Risk Assessment (2016)
CD3.16	Ministerial Statement of Eric Pickles (2015)
CD3.17	Maidstone Borough Council Local Plan Review: Agricultural Land Assessment Supplementary Paper
CD3.18	Renewable Energy Planning Database
CD3.19	Planning Policy Advice Note: Large scale (>50kW) solar PV arrays (January 2014)
CD3.20	Subnational Electricity Consumption Statistics 2005-2021 [available electronically only]
CD3.21	Schedule of Proposed Main Modifications to the Regulation 19 Maidstone Local Plan Review – Post Stage 2 Hearings (September 2023)
4 Landscape and Visual	
CD4.1	Landscape Institute and Institute of Environmental Management and Assessment – Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)
CD4.2	National Character Area Profile 121: Low Weald
CD4.3	TGN06/19: Visual Representation of Development Proposals
CD4.4	TGN02/21: Assessing landscape value outside national designations (Landscape Institute Technical Guidance Note 02/21)
CD4.5	Landscape Assessment of Kent (2004)
CD4.6	Maidstone Landscape Character Assessment (2012)
CD4.7	Maidstone Landscape Capacity Study – Sensitivity Assessment (January 2015)
CD4.8	Maidstone Borough Council Review of Photography and Visual Material
CD4.9	Email from Eversheds Sutherland to Martin Robeson dated 23 November 2023 and response of 28 November 2023 in relation to Council instruction of expert review of LVIA/Addendum

CD4.10	Maidstone Borough Council Biodiversity and Climate Change Action Plan (April 2023) [website extract]
CD4.11	State of Nature Partnership: State of Nature Report 2023
5 Ecology	
CD5.1	British Standard BS 5837 (2012) – Trees in relation to Design, Demolition and Construction
6 Heritage	
CD6.1	English Heritage. 2008. Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment
CD6.2	Historic England. 2015. Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2
CD6.3	Historic England. 2015. Making Changes to Heritage Assets: Historic England Advice Note 2
CD6.4	Historic England. 2017. The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)
CD6.5	Chartered Institute for Archaeologists. 2017. Standard and Guidance for Historic Environment Desk-Based Assessment
CD6.6	Historic England. 2019. Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets
CD6.7	Historic England. 2021. Commercial Renewable Energy Development and the Historic Environment. Advice Note 15
CD6.8	IEMA, IHBC and CIfA. 2021. Principles of Cultural Heritage Impact Assessment in the UK
CD6.9	Historic England: Energy Efficiency in Historic Buildings Solar Electric (Photovoltaics)
CD6.10	Official List Entry: Oasthouse about 60m north east of Little Cheveney Farmhouse
CD6.11	Official List Entry: Barn about 15m south west of Little Cheveney Farmhouse
CD6.12	Official List Entry: Great Sheephurst Farmhouse
CD6.13	Official List Entry: Little Cheveney Farm
CD6.14	Official List Entry: Little Long End
CD6.15	Official List Entry: Oasthouse about 10m north of Great Sheephurst Farmhouse
CD6.16	Official List Entry: Oasthouse about 15m south east of Little Cheveney Farmhouse
7 Planning Appeal Decisions and Court Judgments	
CD7.1	Appeal decision for land near to Bishop’s Itchington, Stratford on Avon, Warwickshire dated 1 December 2022 (APP/J3720/W/22/3292579)
CD7.2	Appeal decision for land at Rawfield Lane, Fairburn, Selby dated 1 December 2022 (APP/N2739/W/22/3300623)

CD7.3	Appeal decision for land east of Mursley Road, Little Horwood, Buckinghamshire dated 2 December 2022 (APP/J0405/W/22/3302716)
CD7.4	Appeal decision for land east and west of A130 and north & south of Canon Barns Road, East Hanningfield, Chelmsford, Essex dated 6 February 2023 (APP/W1525/W/22/3300222)
CD7.5	Appeal decision for Michens Lane, Bramley, Hampshire dated 13 February 2023 (APP/H1705/W/22/3304561)
CD7.6	Appeal decision for land west of New Works Lane, Telford, Shropshire dated 27 March 2023 (APP/C3240/W/22/3293667)
CD7.7	Appeal decision for Great Pagehurst Farm, Staplehurst dated 10 April 2017 (APP/U2235/W/16/314969)
CD7.8	R Corbett v Cornwall Council [2020] EWCA Civ 508 [para 45]
CD7.9	TW Logistics Limited v Tendering DC [2013] EWCA Civ 9 [para 18]
CD7.10	Bernard Wheatcroft Limited v Secretary of State for the Environment [1981] 1 EGLR 139
CD7.11	Bramley Solar Farm Residents Group v Secretary of State for Levelling Up, Housing and Communities [2023] EWHC 2842 (Admin)
CD7.12	Appeal decision for land at Firlands Farm, Berkshire dated 6 July 2015 (APP/W0340/A/14/2228089)
CD7.13	Appeal decision for land east of Parsonage Road and south of Hall Road, Stansted, Essex dated 24 August 2022 (S62A/22/0000004)
CD7.14	Appeal decision for Gunthorpe Road Solar Farm, Wisbech dated 29 September 2023 (APP/A2525/W/22/3295140 and APP/V2635/W/22/3295141)
CD7.15	Appeal decision for land south of Leeming Substation dated 27 June 2023 (APP/G2713/W/23/3315877)
CD7.16	Appeal decision for land to the south of Church Farm, Somersham and land to the east of The Channel, Burstall dated 29 August 2023 (APP/W3520/W/23/3319970)
CD7.17	Appeal decision for Land at Park Farm, Gillingham, Dorset dated 13 February 2023 (APP/D1265/W/22/3300299)
CD7.18	Appeal decision for land at Crays Hall Farm, Church Lane, Crays Hill, Essex dated 20 August 2023 (APP/V1505/W/23/3318171)
CD7.19	Planning permission for Land East And West Of St Cleres Hall Pit Main Road Danbury Chelmsford dated 27 October 2021 (21/00081/FUL)
CD7.20	Appeal decision for land west of Thaxted Road, Saffron Walden dated 30 May 2023 (S62A/2022/0014)
CD7.21	R (oao Substation Action Save East Suffolk Limited v Secretary of State for Business, Energy and Industrial Strategy [2022] EWHC 3177 (Admin)
CD7.22	Solo Retail Limited v Torridge District Council [2019] EWHC 489 (Admin)
CD7.23	Appeal decision for land west of Thaxted Road, Cutlers Green Lane, Thaxted dated 18 December 2023 (APP/C1570/W/23/3319421)
CD7.24	Appeal decision for land at Elm Farm, Bristol Road, Iron Acton, Bristol dated 13 November 2023 (APP/P0119/W/22/3294810)
CD7.25	Tesco Stores Ltd v Dundee City Council [2012] P.T.S.R 983

CD7.26	Appeal decision for land north of Lullington, Swadlincote, Derbyshire (APP/F1020/W/22/3313316)
8 Legislation	
CD8.1	Climate Change Act 2008 (2050 Target Amendment) Order 2019
CD8.2	Climate Change Act 2008
CD8.3	Town and Country Planning (Appeals) (Written Representations Procedure) (England) Regulations 2009
CD8.4	Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)
9 Statements of Case	
CD9.1	Statement of Case on behalf of the Appellant
CD9.2	Statement of Case on behalf of the Council
10 Statement of Common Ground	
CD10.1	Statement of Common Ground between the Appellant and the Council
CD10.2	Statement of Common Ground between the Appellant and the Council relating to Ecology dated 19 December 2023
11 Appellant Proofs of Evidence	
CD11.1.1	Proof of Evidence of Allison Walters
CD11.1.2	Summary Proof of Evidence of Allison Walters
CD11.1.3	Appendices to Proof of Evidence of Allison Walters
CD11.2.1	Proof of Evidence of Tony Kernon
CD11.2.2	Summary Proof of Evidence of Tony Kernon
CD11.2.3	Appendices to Proof of Evidence of Tony Kernon
CD11.3.1	Proof of Evidence of Chris Cox
CD11.3.2	Summary Proof of Evidence of Chris Cox
CD11.3.3	Appendices to Proof of Evidence of Chris Cox
CD11.4.1	Proof of Evidence of Robert Sutton
CD11.4.2	Summary Proof of Evidence of Robert Sutton
CD11.5	Rebuttal Proof and Appendix of Allison Walters
CD11.6	Rebuttal Proof and Appendix of Chris Cox

12 Council Proofs of Evidence	
CD12.1	Proof of Evidence of Martin Robeson
CD12.2	Appendices to Proof of Evidence of Martin Robeson
CD12.3	Summary Proof of Martin Robeson
CD12.4	Proof of Evidence of Peter Radmall
CD12.5	Appendices to Proof of Evidence of Peter Radmall
CD12.6	Proof of Evidence and Appendices of Jeremy Fazzalero
13 Other Correspondence/Documents	
13.1	Start Letters dated 13 September 2023
13.2	Pre Case Management Conference Note dated September 2023
13.3	Post Case Management Conference Note dated November 2023
14 Documents Submitted to the Inquiry	
14.1	Drawing Number SCUKK-SHEEP-000 100 (Q) General PV Layout
14.2	Drawing Number P22-2992_0021 132KV Overhead Lines
14.3	Appellant's Noise Response to Peter Radmall Proof of Evidence (CD12.4) paragraph 5.15
14.4	Measurements from redline boundary to proposed hedgerow along northern boundary of site
14.5	Updated Table of Conditions as agreed at 23 January 2024
14.6	Plan showing distances from listed buildings to PV arrays