

Power, Laura

From: Martin Robeson <martinrobeson@mrpp.co.uk>
Sent: 28 November 2023 14:00
To: Macdonald, Roddy
Cc: John.Legg@planninginspectorate.gov.uk; Power, Laura; MarionGeary@Maidstone.gov.uk; Craig Stewart
Subject: RE: 3321094 - Land North Of Little Cheveney Farm, Sheephurst Lane, Marden

Roddy,

Further to the below,

- Obtaining this additional review was authorised by Maidstone Borough Council on 11.10.23
- Instruction by Peter Radmall to Mike Spence was: "I have an appeal for another solar farm (in Kent) and wondered if you could carry out your usual review of the ZTV, photography and visualizations some time over the next 2 weeks." Since he had worked with him on several occasions, there was no need for Mr Radmall to elaborate.
- The instruction was issued on 11.10.23
- Mike Spence's review was received on 17.10.23

Kind regards
Martin

Martin Robeson
MRPP
21 Buckingham Street
London, WC2N 6EF
Tel: 020 7930 0007
martinrobeson@mrpp.co.uk

From: Martin Robeson <martinrobeson@mrpp.co.uk>
Sent: Friday, November 24, 2023 12:44 PM
To: RoddyMacdonald@eversheds-sutherland.com
Cc: John.Legg@planninginspectorate.gov.uk; LauraPower@eversheds-sutherland.com; MarionGeary@Maidstone.gov.uk; Craig Stewart <craigstewart@mrpp.co.uk>
Subject: RE: 3321094 - Land North Of Little Cheveney Farm, Sheephurst Lane, Marden

Roddy,

On behalf of Maidstone Borough Council, I write to confirm its decision today to not call an agricultural / soils witness to deal with detailed matters arising.

With regard to the matters you raise concerning the LVIA/Addendum, I am making enquiries as to the information sought but it is unlikely that I will not be in a position to reply before close of business on Monday.

Kind regards
Martin

Martin Robeson
MRPP
21 Buckingham Street

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Tel: 020 7930 0007
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From: Macdonald, Roddy <RoddyMacdonald@eversheds-sutherland.com>
Sent: 23 November 2023 16:46
To: Craig Stewart <craigstewart@mrpp.co.uk>; Power, Laura <LauraPower@eversheds-sutherland.com>
Cc: john.legg@planninginspectorate.gov.uk; Martin Robeson <martinrobeson@mrpp.co.uk>; Marion Geary <MarionGeary@Maidstone.gov.uk>
Subject: RE: 3321094 - Land North Of Little Cheveney Farm, Sheephurst Lane, Marden

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Good Afternoon Craig

Thank you for providing a copy of the expert review undertaken on behalf of the Council in respect of the LVIA/Addendum.

Could you also please:

1. Provide a copy of the instructions issued by the Council to the expert so that the Appellant may understand what the expert was asked to report on.
2. Confirm the date when instructions were given to the expert.
3. Confirm the date when the expert review was issued to the Council.

Could the above please be provided within the next 3 days. This information is required in order that it may be addressed in the Appellant's evidence.

Kind regards

Roddy

Roddy Macdonald | Legal Director | Planning and Infrastructure Consenting | Eversheds Sutherland

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From: Craig Stewart <craigstewart@mrpp.co.uk>
Sent: 17 November 2023 14:32
To: Macdonald, Roddy <RoddyMacdonald@eversheds-sutherland.com>; Power, Laura <LauraPower@eversheds-sutherland.com>
Cc: john.legg@planninginspectorate.gov.uk; Martin Robeson <martinrobeson@mrpp.co.uk>; MarionGeary@Maidstone.gov.uk
Subject: 3321094 - Land North Of Little Cheveney Farm, Sheephurst Lane, Marden

Roddy/Laura,

Please find attached and below the requested details of the evidence the Council relies on dealing with matters identified in paragraphs 59 and 95 of its Statement of Case, as agreed at the CMC.

95. The Council will identify the following relevant inefficiencies inherent in the proposal: the lack of provision of Battery Storage within the Proposed Development; and that the substantial quantity of landscape mitigation required in this location reduces the site coverage of solar panels, reducing the electricity generation per unit of land used. The Council will assert that this would reduce the positive weight which can be afforded to the renewable energy generation.

Kind regards,

Craig Stewart
MRPP
Senior Planner
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