ASH-CUM-RIDLEY PARISH COUNCIL
PLANNING APPLICATIONS WORKING GROUP

Notes of the meeting of the Planning Applications Working Group held on 14 August 2025 in Person, commencing at 7.45pm

Present:	Cllr C Clark (Chairman) Cllr J Clucas Cllr P Kirtley Cllr G Pender Cllr I Macleod Cllr J Scott Cllr F Cottee
In Attendance:	Alison De Jager – Clerk Megan Hodges – Assistant Clerk

1. Apologies for absence

Apologies were received from Cllrs S Fishenden, S Hobbs, C Gorton, V Ngwenya, M Aspinall, R Brammer and M Manley.

2. Declarations of Interest

None.

3. Notes

The notes of the meeting held on 5 August 2025 were AGREED. PROPOSED: Cllr J Clucas SECONDED: Cllr C Clark and AGREED.

4. Applications

24/03422: Various Sites Including Land South Of Idleigh Court Road And East Of Hartley Bottom Road New Ash Green Kent - Proposed development of a photovoltaic solar array farm with associated ancillary infrastructure, cable route and grid connection and new access track, alongside localised land re-grading works. Cllr C Clark PROPOSED the Parish Council delegate the final decision for the response to the officers following consultation by email to the councillors. For the avoidance of doubt, the Parish Council supports the UK Government's aim to reduce the use of fossil fuels and improve energy efficiency in order to make the UK less reliant on external fuel supplies, particularly gas. The Parish council notes that the substitution of alternatives to fossil fuels, such as solar or wind power, may require the sacrifice of amenity and agricultural land whereas increasing energy efficiency and reducing energy use does not.

The Parish Council, in representing the views of all its residents, takes note of the thousands of responses objecting to the proposed development, and particularly notes the updated detailed responses of the New Ash Green Village Association and the No to NAG Solar group. As clearly articulated by both the latter responses, we believe that the period allowed for response to the revised application is inadequate and is also disproportionate to the time made available to the applicant to respond to previous objections.

The Parish Council strongly objects to this application on all the grounds previously expressed. The proposal would cause substantial harm to the Green Belt, agricultural land, the landscape, ecology, and local amenity, with no overriding benefits that justify its approval.
The removal of the BESS from the application does not justify the solar farm. The applicants admit that the result may be power generated which cannot now reach the grid. Very substantial solar farm capacity has now been built or given permission locally (Horton Wood-49.9MW site 134,000 panels, Speedgate-Chimmers Solar Farm 49.9MW 100,000 panels, Gabrielspring Wood Solar-17.5 MW site 30,000 panels. There is also a large site proposed at Dean Bottom in Fawkham). It seems likely that we already have as much solar power generation as the grid can take in this part of North Kent.

We have repeated our original objections below, with any revisions based on new evidence added in italics.

Green Belt Protection
The proposed development is within the Green Belt and conflicts with both national and local planning policy. The National Planning Policy Framework (NPPF) states that inappropriate development in the Green Belt should not be approved except in very special circumstances. The applicant has failed to demonstrate such circumstances. The land in question is high-performing Green Belt, which contributes to maintaining the openness of the countryside. The applicant's assessment underplays this designation by asserting that the area is Grey Belt land. This is not the case as the land shows significant biodiversity (including Ancient Woodland), is widely used for public enjoyment and is not previously developed land. In addition, it performs a vital function in preventing the merger of settlements that would result in formation of an "urban ring". Additional evidence based on the unique status of New Ash Green is provided by the previous NAGVA submission. We urge the planning authority to give full weight to Green Belt protection. Additional development of solar in Fawkham and Speedgate as well as further housing in Fawkham to the east of New Ash Green means that residents in this area are being squeezed for green space. Ridley Court Farm and Idleigh Hill to the west of New Ash Green is almost the last open green area left to them.

Loss of Agricultural Land
The application undervalues the agricultural productivity of the site. Local knowledge, including information from a landowner, confirms that the land is of significant agricultural value. The NPPF emphasises the importance of safeguarding the best and most versatile agricultural land (Grades 1-3a).
The amount of soil disturbance and concrete necessary for the elevated panels ensures that the land cannot be returned to productive agriculture at the end of the proposed operational lifetime. Given the national need for food security, the permanent loss of productive farmland for solar infrastructure is unjustified, particularly when that infrastructure need is already in the process of being met.

Ed Miliband MP, Secretary of State for Energy Security and Net Zero, stated in the Solar Roadmap (30th June 2025) "We will always prioritise brownfield, industrial

and low-grade agricultural land over high quality farmland. Our commitment to food security and protecting our countryside remains a central part of our strategy".

Landscape and Visual Impact

The topography of the site necessitates an elevated positioning of solar panels, increasing their visibility in the landscape. This will lead to significant adverse effects on the character and appearance of the area, which is designated Green Belt land. The proposed mitigation through may not be sufficient to screen the development effectively.

NAGVA have requested that SDC carry out an independent assessment of glint and glare that takes into account the actual topography and tree cover on the border with New Ash Green. In addition, the fencing off of the infrastructure and the amount of video surveillance requested by Kent Police will reinforce the industrial appearance of the development.

The updated Landscape and Visual Harm Impact Assessment (LVIA) underestimates harm by focusing on summer views and ignoring significant winter visibility when planting provides little screening. They confirm that Glint and Glare impacts on residential receptors remain even after mitigation.

The LVIA is wholly inadequate. No accurate visual mock-ups have been provided to show what this very large solar farm will actually look like. 3 metre high panels, 2 metre high fences and 5 metre CCTV poles are substantial and invasive industrial elements in this landscape and they are not depicted. No elevation or contouring is shown on the site plans so the nature of the land cannot be understood without visiting it. It is a classic tight North Kent valley and hill site. Steep and undulating in most places- north facing in many- one of the worst places imaginable for a solar farm site in terms of efficiency. (Please see the attached OS map which shows the contouring on the site).

The 2 metre high Visibility Splays around Cuckolds Corner are within metres of local houses, are overbearing and will radically alter their access to light and sight of the valley.

Ecological Concerns and Biodiversity Net Gain (BNG) Issues.

The Biodiversity Net Gain (BNG) and Ecological Impact Assessment (EcIA) do not comply with the National Planning Policy Framework (NPPF) concerning irreplaceable habitats. The applicant has failed to correctly classify ancient woodland (~16.416ha) as irreplaceable and plans to remove 0.02ha of ancient woodland, which is unacceptable under biodiversity policies. The assessments contain inaccuracies, and the methodology used is questionable, particularly regarding habitat classification and biodiversity net gain calculations. The impact on local flora and fauna, including ancient woodland ecosystems, has not been adequately considered. Neither has the effect of the deep trenches and defensive hedging required by Kent Police. The presence of ancient woodland nearby means that shading from trees will also reduce the efficiency of the panels whilst altering the local ecosystem.

Ecological Impact Assessment (EcIA) Issues

Survey Deficiencies: Botanical surveys were conducted outside optimal periods, reducing accuracy. Key species such as Great Crested Newts, Hazel Dormice, and reptiles have not been adequately surveyed, and assumptions about their absence are unreliable. Birds like Turtle Dove and Corn Bunting are overlooked despite the site being a priority area.

Biodiversity Net Gain (BNG) Concerns

The proposal fails to meet the emerging 20% net gain target, achieving only 14%.

Unrealistic habitat proposals: The feasibility of creating

Lowland Deciduous Woodland and Wildflower Grassland is questionable, with inadequate methods outlined.

Soil suitability has not been assessed properly, raising doubts about habitat creation claims.

The claimed gains rely heavily on grassland enhancement beneath solar panels, where ecological condition is likely to decline. Furthermore the development continues to place pressure on irreplaceable ancient woodland and its buffer zones, contrary to NPPF and standing advice.

BNG- Great Crested Newts (GCN) - the developers use of district level licensing for great crested newts acknowledges unavoidable harm to GCN habitat on site.

This undermines the overall ecological integrity of the site and reinforces that the development's harm to biodiversity cannot be fully mitigated.

Given that the BNG and EcIA are inadequate we believe a full Biodiversity Net Habitat Management and Monitoring Plan and a Construction Environmental Management Plan should be undertaken before any further consideration of the planning proposal.

Need for Expert Review A professional ecologist should review habitat classifications, survey methods, and policy compliance while proposing alternative biodiversity solutions.

The application contains serious flaws in ecological assessments, breaches national policy on irreplaceable habitats, and fails to maximise biodiversity net gain.
Further professional scrutiny and revisions are required. Revised documents from the applicant have asserted a net gain in biodiversity that would be based on compliance with two as yet unpublished environmental management plans.

Assessments by an expert on local ground flora in ancient woodland has found significant stands of spurge laurel Daphne laureola (a one star rarity) and small teasel Dipsacus pilosus (a 2 star- out of 3 national rarity) and described as scarce and extremely local in the Kent Atlas of Flora. There are also significant numbers of purple orchid and birdsnest orchid Neottia nidusavis (nationally rare) may also occur in this complex.

Highway and Access Issues

The proposed access routes for construction and maintenance vehicles are unsuitable, all depending on one C grade road. The narrow rural roads leading to the site are in poor condition and not designed to accommodate large construction vehicles. This will cause severe disruption to both local residents and the neighbouring Parish and would also lead to prolonged construction timelines.

The proposed traffic light controlled one way system would be unworkable because of the number of vehicles (estimated at 1,000 plus 100 HGVs from measurements in Hartley Bottom Road) plus the slow start of stationary HGVs, which would rapidly lead to gridlock. The situation in an emergency could be fatal. Furthermore, the required cabling works will pass close to residential properties, exacerbating disruption for residents.

The length of the construction period would also be highly inconvenient and disruptive. It is estimated at 9 months but given the difficulty of access would surely run longer. During that period access for walkers, cycle riders, horseriders and other vehicles would be very restricted. For walkers, cycle riders and horseriders it appears actively dangerous.

The cable laying from the site to the substation follows most of the arterial roads and access points around New Ash Green. It covers over 3.5 km of highway. Digging this cable alone will cause months of disruption and delays for the residents of New Ash Green, West Yoke and Hartley.

Heritage and Visual Impact on Local Settlements The application fails to fully acknowledge the heritage value of the surrounding area. The proximity to Berry's Maple and other historically significant sites raises concerns about the visual impact on the local character and cultural heritage. Any industrialisation of this rural landscape is contrary to the original vision of New Ash Green, which was designed to maintain a green and open environment.

Site Selection and Justification
The justification for selecting this site is weak. The applicant has not demonstrated that this is the most suitable location for a solar farm relative to the grid connection point. More appropriate sites exist that would have a lesser impact on the Green Belt and local communities. The claim that power generation must be evenly distributed across the county is not a valid planning justification, as the National Grid is designed to transport power where needed. This is why we are able to import nuclear power from France, utilise off-shore power generation and site our own nuclear power stations in sparsely populated areas. *The connection point to the Switching Station is over 3 from the site. The impact of trenching and laying the connection is not properly shown and there is no assessment of the power degradation and loss involved in that length of connection. Additionally the topography of the site has not been properly demonstrated to the Planning Committee. There is no contouring shown. It is mostly a steep and hilly site, much of it north facing with considerable shade thrown by the trees in the ancient woodland. It is obviously an unsuitable site for a solar farm purely from an energy efficiency perspective.(Please see the attached OS map section showing the proposed site).*

Noise Pollution
The noise assessment for the battery storage area is insufficient. Given the

valley's topography, sound is likely to carry to nearby residential areas, impacting residents' health and well-being. There is minimal background noise in this location, making even minor noise emissions more intrusive. Noise measurements for both humans and bats have used weightings which are inappropriate. *There is no evidence that the suggested "acoustic fence" is a technology that will work. It appears to be no more than a louvre blind construction.*

Conclusion

It is clear from the conflicting evidence provided by experts on both sides of the application that there are conflicts of evidence about many of the aspects of the application as well as the choice of site and whether the extra solar capacity is even necessary given the rate of recent approvals. As noted many of these approvals are very local.

There is mounting evidence that the amount of solar power capacity in the system is already well in excess of UK Government 2035 targets. The sacrificing of this valuable Green Belt amenity would be permanent. For that sacrifice to be made when the target is already met would amount to wanton destruction.

There are alternatives available to meet the UK's power needs. In particular we can learn from the experience of Germany and France, who have made solar capacity on industrial buildings and new-builds a success. There is evidence that adopting the same policies in the UK would provide 117GW of solar power compared with a government target of 85GW (source CPRE) without sacrificing a scrap of land.

In summary, this application is superfluous to 2035 UK Government targets and to sacrifice irreplaceable Green Belt land to it would be an act of vandalism that our children would not forgive.
The removal of the BESS does not change the objections to the site, other than meaning that much of the energy from the site may not be able to be stored, and thus wasted.

Please see attached site location. SECONDED: Cllr J Scott and AGREED. FOR: 6 AGAINST: 0 ABSTENTIONS: 1

25/01679: Holywell Farm House Greenfields Hodsoll Street Kent TN15 7LE - Replacing existing internal staircase with alterations to void above staircase. Cllr F Cottee PROPOSED the Parish Council does not object to this application as long as it does not conflict with local planning policy SECONDED Cllr J Clucas and AGREED.

5. Decisions

The decisions as set out on the Agenda were RECEIVED and NOTED.

6. Other Matters for Discussion

The meeting closed at 8.45pm