ASH-CUM-RIDLEY PARISH COUNCIL
PLANNING APPLICATIONS WORKING GROUP

Notes of the meeting of the Planning Applications Working Group held on 04 June 2025 at Hodsoll Street & Ridley Village Hall, Hodsoll Street, TN15 7LE, commencing at 7.45pm

Present:	Cllr C Clark (Chairman) Cllr R Brammer Cllr J Clucas Cllr F Cottee Cllr C Gorton Cllr P Kirtley Cllr M Manley
In attendance:	Alison de Jager - Parish Clerk 34 Members of the public

1. Apologies for absence

Apologies were received from Cllrs M Aspinall, S Fishenden, S Hobbs, I MacLeod, V Nwenya and J Scott. District Councillors Penny and Perry Cole also sent their apologies.

2. Declarations of Interest

None.

3. Notes

The notes of the meeting held on 2nd April 2025 were AGREED. PROPOSED: Cllr M Manley SECONDED: Cllr J Clucas and AGREED.

4. Applications

24/03422/Amendment: Various Sites including Land South of Idleigh Court Road and East of Hartley Bottom Road, New Ash Green – Proposed development of a photovoltaic solar array farm with associated battery energy storage system, ancillary infrastructure, cable route and grid connection. New access track.

Following the reading of the draft proposal, but before the vote, the meeting was suspended at 8.08pm to allow comments from members of the public.

The meeting reconvened at 8.14pm

Cllr F Cottee PROPOSED the following objection. SECONDED: Cllr M Manley and UNANIMOUSLY AGREED. (the original submission has been resubmitted with additional comments made in italics)

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 hundreds of responses objecting to the proposed development, and particularly notes the 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.

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

1. 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 NAGVA submission.* We urge the planning authority to give full weight to Green Belt protection.

2. 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.*

3. 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 planting will 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.

4. 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.

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.*

5. Fire and Safety Concerns
The development includes lithium battery storage, which carries a significant fire risk, particularly given the site's limited access for emergency services. The

amount of water required to control a lithium battery fire could cause severe environmental contamination, including potential groundwater pollution. The risk assessment provided does not sufficiently address these concerns. *Submitted expert advice is equivocal and does not acknowledge the seriousness of the risk, only the likelihood of occurrence. Kent Fire and Rescue's statement that " We also acknowledge that KFRS are learning and developing along with this evolving technology & approaches to mitigating risk at BESS sites. An outline FMP and ERP would be expected at this stage, as an evolving document, to assist KFRS in helping the clients design team in developing a finalised FMP and robust ERP" suggests significant unknown risk. The Environment Agency still awaits a viable scheme to prevent fire extinguishing water infiltrating into the ground.*

6. 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.

7. 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.

8. 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.*

9. 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.

Conclusion

It is clear from the conflicting evidence provided by experts on both sides of the application that there is reason to be very concerned about the safety of the battery storage facility. In addition, there are similar conflicts of evidence about many of the other 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.

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.

25/00626: New Ash Green Shopping Centre, The Row, New Ash Green - Proposed new roof with roof windows to northeast elevation. Cllr J Clucas PROPOSED that the Parish Council does not object to this application as long as it does not conflict with local planning policy. However, it is concerned about the cumulative impact of these piecemeal submissions rather that an application for the overall plan. SECONDED: Cllr C Gorton and AGREED

25/00626: 4 Billet Cottages, Crowhurst Lane, TN15 7HH – Single storey rear extension with rooflights. Cllr M Manley PROPOSED that the Parish Council does not object to this application as long as it does not conflict with local planning policy and falls within the 50% rule. SECONDED: Cllr C Clark and AGREED

5. Decisions

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

6. Other Matters for Discussion

Cllrs J Clucas and F Cottee attended a webinar provided by Campaign to Protect Rural England (CPRE) which was beneficial.

The meeting closed at 8.31pm