Little South Solar Farm

Our proposal for Little South Solar Farm has been designed to benefit the environment, the economy and local communities. It will generate enough clean energy to power thousands of homes, support habitats for local wildlife, and boost investment in the local economy and community projects.

Contents

Introduction and key changes

How will Little South benefit the local area?

Supporting our Green Future, generating renewable electricity equivalent to the needs of 15,000 homes.*

Economic Benefits, £50,000 pa to Dover District Council in business rates and a community benefit fund of over £796,000 for local causes over its operational lifetime.

No loss of "Best and Most Versatile" agricultural land as a result of the solar farm.

Support for Habitats and Local Wildlife with 20% biodiversity net gain for habitats and 142% net gain in hedgerow habitat.

Carefully Designed to preserve the character of the Roman Fort and Amphitheatre with a range of natural screening and a design that works with the local landscape.

*Based on average household consumption of 3,509 kWh, BEIS 2022.

Since we introduced our plans to the public in 2022, we have spoken to a range of local people and experts who have helped shape the scheme to maximise benefits and minimise impacts for the local community. We have listened to the views of local people and organisations, and we believe this focus on engagement has delivered the best possible proposal for the site. We are profoundly grateful to everyone whose feedback has helped shape our submitted plans.

We started consulting local people in 2022, holding an early meeting with parish representatives. This was followed by a programme of wider community engagement in 2023, seeking views and ideas to help shape the emerging proposals. Alongside this, we engaged with experts and organisations across a range of technical disciplines as well as officers at the relevant local councils.

The submission of a planning application does not mark the end of our engagement with consultees.

We have continued to carefully review responses to the formal consultation on the application and respond to feedback.

The proposals have evolved in response to the questions and comments we have received. However, as engagement is iterative, and answers to questions are often distributed across a range of planning documents, this paper has been prepared to collate clear answers to the queries we have received to date.

We look forward to continuing to engage with technical consultees, local representatives and communities as the plans for Little South progress.

Charlotte Healey,
Head of Solar, Statkraft UK

Key changes from local feedback

A reduction in the maximum height for panels from 4.46m to 2.7m

A temporary access road for construction traffic to bypass tight corners during construction and adding two different access points for construction vehicles

A new 16 ha nature restoration area, including wildflower grassland and drainage ditches to the north east of the site

A reduced area of the solar panels so that they are further away from heritage assets, including over 1km from Richborough Roman Fort and 500m from the amphitheatre

Making best use of the land

The land proposed for Little South Solar Farm is a rarity. It is in one of the best locations for sunshine in the UK, helping us maximise the renewable energy we can generate. It is located next to the existing electricity grid, allowing for simple connection to the electricity network without the need for additional new pylons or miles of underground cabling.

And, unusually for Kent, the farmland at Little South isn't categorised as Best and Most Versatile agricultural land.

We are confident that our site is ideal for generating solar energy. But it is also important that we make good use of it, with plans that are sensitive to the landscape, respect our heritage, and enhance nature.

In this section, we have sought to answer questions about the decision to promote this particular site for solar, as well as considering the impact, and benefits, that the development can have on the future of the farmland.

Are there already enough solar farms in the area?

There is still a need for more renewable energy, as reflected in national and local policy. This includes the UK's legal commitment to achieve net zero greenhouse gas emissions by 2050, which has been matched at a local level by Dover District Council.

We have carried a cumulative impact assessment to ensure that Little South Solar Farm doesn't cause unacceptable impacts when considered alongside other developments. This analysis included the existing built schemes at Marshborough Farm (approximately 380m away) and Ebbsfleet Farm (approximately 3.2km away), as well as the scheme adjacent to the River Stour for which construction has yet to commence.

This research concluded that the landscape can accommodate the development without unacceptable effects on the landscape and visual character of the area.

This document sets out answers to questions we have received on how we are making sure that our plans will be acceptable.

Read more at:

- **Little South Solar Farm PDAS (3.2.4)**
- **ES Little South Solar Farm - Chapter 7 Landscape and Views (7.166 – 7.191)**

Making best use of the land

Will Little South Solar Farm result in high-quality agricultural land being taken out of production?

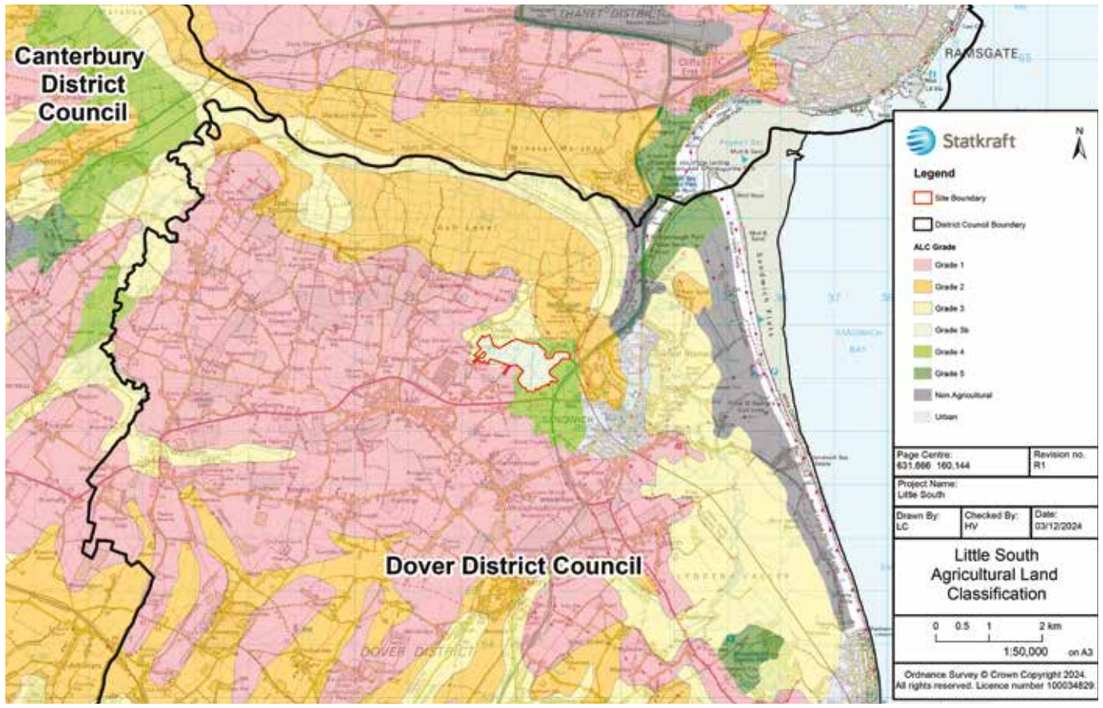
Our site is not on Best and Most Versatile (BMV) agricultural land – a rarity in the local area. We commissioned a detailed survey of the quality of the land, which was undertaken by experts from Wardell Armstrong in November 2021. This confirmed over 90% Grade 3b land – assessed through soil samples as being of moderate quality – with the rest of the site falling outside agricultural use.

By avoiding BMV land, our proposal is fully compliant with National Policy and Policy CC3 of Dover District Council's emerging Local Plan, which seek to avoid the highest quality land for renewable energy development wherever possible.

Additionally, the temporary removal of the site from intensive agriculture, mostly arable, and the possibility to graze sheep at the solar farm, will help the soil recover and improve. This will benefit agricultural productivity once the site is decommissioned and returned to farming use.

Read more at:

- **Little South Solar Farm PDAS (6.1.62)**
- **Little South Solar Farm - ALC report (4.1.1), DRG No: CA 12287/001**
- **https://solarenergyuk.org/wp-content/uploads/2022/09/Briefing-Solar-Farms-Food-Security_The-Facts_Sept2022.pdf**



Map showing Best and Most Versatile (BMV) agricultural land

Could the development be on lower quality agricultural land?

Little South Solar Farm isn't on Best and Most Versatile (BMV) agricultural land. This lower quality agricultural land is rare in Dover district and the rest of Kent, where BMV land is widespread.

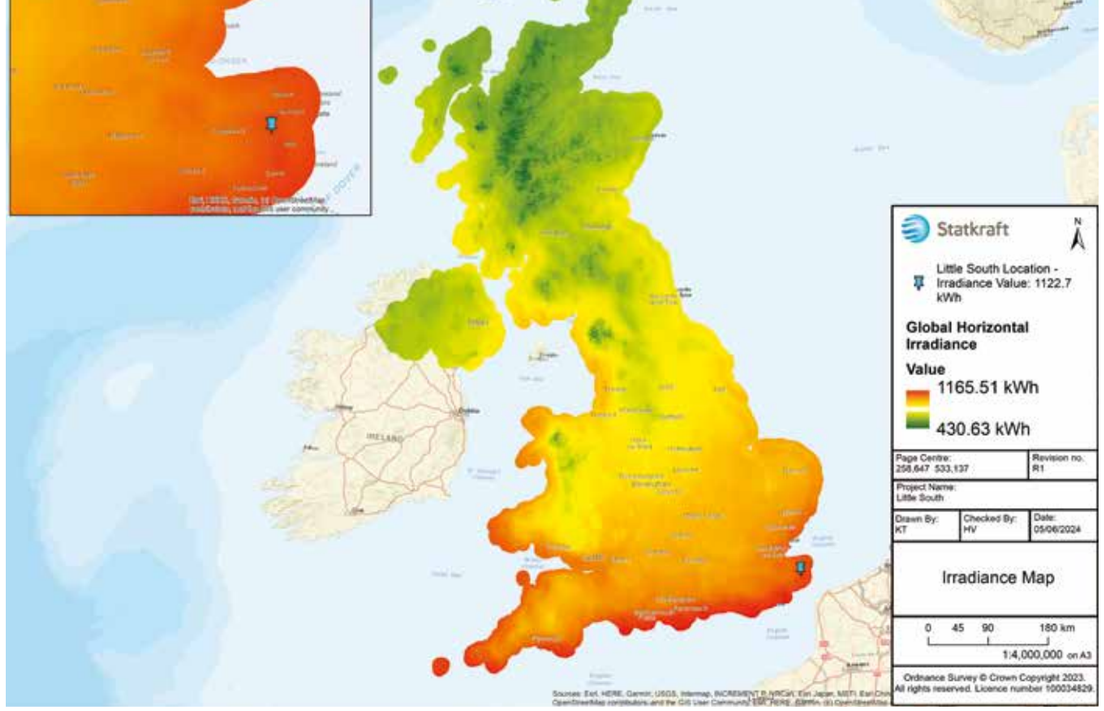
We chose this site after a thorough selection exercise, considering planning policy, the environment, and technical criteria, including a preference for agricultural land that is not of the highest quality.

Our site is ideally suited to solar development because:

- It has one of the highest levels of solar irradiance of anywhere in the country
- It isn't on Best and Most Versatile agricultural land
- It has an on-site connection to the grid
- There are opportunities to enhance wildlife, especially through the creation of new floodplain grazing marsh habitat, supporting the Local Wildlife Site.

Read more at:

- **Little South Solar Farm PDAS (6.1.62)**
- **Little South Solar Farm - ALC report (4.1.1), DRG No: CA 12287/001**



Map showing solar irradiance

Making best use of the land

Could this development happen on a brownfield site instead of agricultural land?

We considered if there were any alternative brownfield sites that could be used for this development, but none were available within 3km of the grid connection point.

Additionally, local planning policy prioritises brownfield land for more permanent development like housing and retail, so it is rarely available for solar development. If previously developed sites are not used for housing, more homes would need to be built on agricultural land resulting in its permanent loss, unlike temporary and fully reversible solar schemes like Little South. Also, brownfield sites often come with environmental issues associated with their former uses which can limit their viability for solar development.

Read more at:

- **ES Little South Solar Farm - Chapter 4 Alternatives and Design Evolution (4.4 - 4.19)**
- **Little South Solar Farm PDAS (3.3)**
- **Dover District Local Plan 2010 – table 3.2**

Should the scheme be placed on rooftops instead?

We agree that rooftops will make an important contribution towards achieving net zero but we can't tackle the climate emergency in time through rooftop solar alone.

In order to meet our country's net zero targets, the government has set out plans for a fivefold increase in solar power by 2035. This is enough to power around 20 million homes. If we are going to reach this target, we need to maximise deployment of both ground and rooftop solar.

Our site benefits from a grid connection timescale that means we can help meet this critical target in the efforts to address the climate crisis. Ground-mounted solar technology is one of the cheapest ways to produce electricity and can be deployed rapidly.

Read more at:

- **Little South Solar Farm PDAS (3.2)**

Is the site in the green belt?

No. Green belt exists primarily to prevent coalescence of major settlements and is usually located around major cities. There is no green belt in Dover District.

Read more at:

- **Little South Solar Farm PDAS**
- **NPPF Chapter 13**

Will this turn the land into a brownfield site, making future development easier?

Solar farms will not change the status of the land.

Solar developments are temporary and entirely reversable. Once the solar farm is removed after 40 years, the land will return to agricultural use and will not be classed as previously developed land under the definition in the National Planning Policy Framework.

Read more at:

- **SEUK – Factsheet, Solar Farms and Agricultural Land – June 2024**
- **National Planning Policy Framework, Glossary of Terms – Previously Developed Land**

Will the solar farm reduce the quality of the soils and the grading of the land over time?

Solar farms touch lightly on the land. They are temporary, entirely reversible and do not harm soil quality. This has been established at several planning appeals.

Furthermore, the legs used for the solar panel framework are typically a 3mm steel alloy. These are knocked directly into the ground without the use of concrete and cause minimal soil disturbance.

The legs are designed to stay intact through out the lifetime of the proposal and are pulled from the ground by machine in one piece.

Overall, the development is entirely reversible and all land will be returned to agricultural use at its original grade following decommissioning.

Furthermore, by resting the land from its current intensive agricultural use, the development will support soil restoration and enhance the future productivity of the land.

It is also possible for land to be used for agricultural grazing while a solar farm is operational.

Read more at:

- **Little South Solar Farm - ALQ and C_Part1 (5.3 - 5.9)**
- **Planning appeal decisions:**
  - **(APP/D0840/A/221638)**
  - **(APP/C1570/W/23/3319421)**
  - **(APP/U2235/W/23/3321094)**
  - **(APP/G2713/W/23/3315877)**
  - **(APP/H1705/W/22/3304561)**

Making best use of the land

Will the development mean that more food has to be imported because of the loss of agricultural land?

Solar farms don't jeopardise the UK's food security – they help strengthen it. Climate change causes crop failure; solar farms tackle climate change.

The UK Government's Food Security Report, published in December 2021, is explicit:

"The biggest medium to long term risk to the UK's domestic production comes from climate change and other environmental pressures like soil degradation, water quality and biodiversity."

In this report, the government sets out that in a medium emissions scenario, climate change could have a catastrophic impact on the proportion of farmland considered Best and Most Versatile, falling from 38.1% to 11.4%. The impacts of climate change are already being felt in the UK, such as the 2022 drought which caused our potato crop to shrink. Excessive rainfall also has an impact; the Agriculture and Horticulture Development Board has set out that oilseed rape, winter barley and wheat production is down as a result of unfavourable weather over the past two years.

By making our site a home for nature, we will enhance biodiversity and increase the numbers of pollinators, which is critical for the future productivity of UK agriculture.

Read more at:

- **Solar Energy UK (2022) Solar Farms & Food Security: The Facts, Solar Energy UK.**
- **DEFRA 2021 – Indicator 2.1.3**
- **https://www.theguardian.com/environment/2024/apr/10/uk-food-production-down-record-rainfall-farmers**

Tackling climate change and increasing energy security

Solar power is a critical part of the fight against climate change; we can't hit our net zero targets without a fivefold increase of solar by 2035.

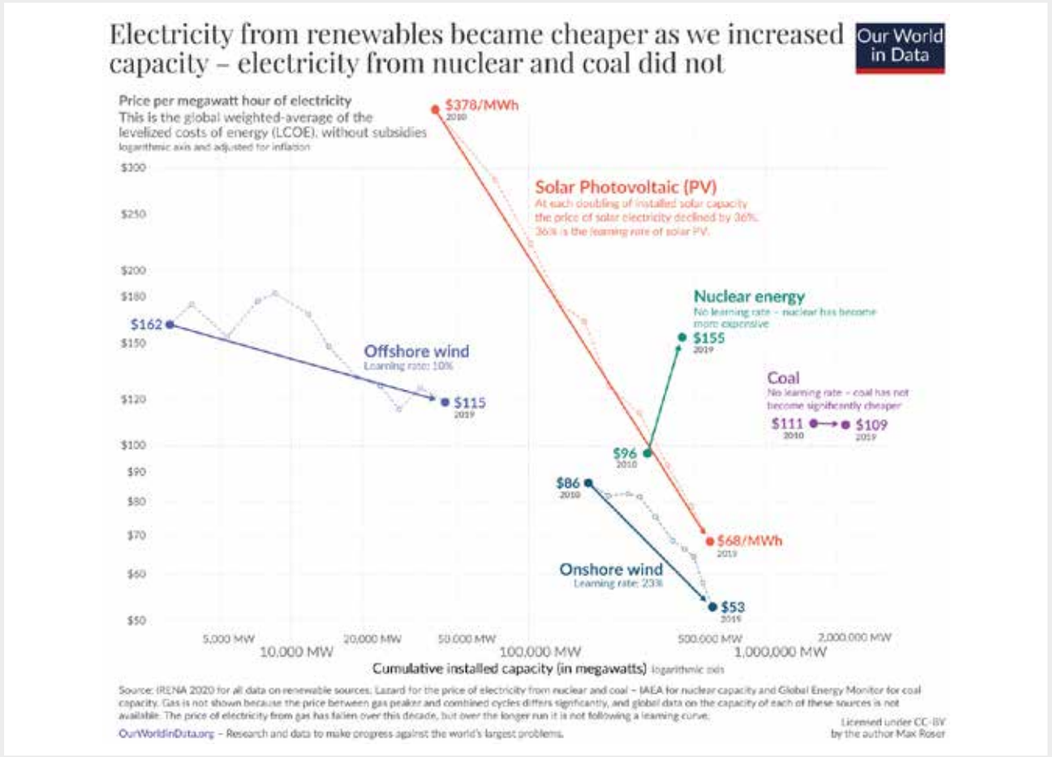
Both the UK Government and Dover District Council have declared a climate emergency, and national planning policy states that the planning system should support renewable and low carbon energy and associated infrastructure.

The energy produced at Little South will go directly into the national grid, providing clean energy and helping to reduce reliance on expensive fossil fuels.

How much does solar power cost?

Solar power is one of the cheapest energy sources in the UK and will get cheaper as we build more.

In most places in the world, power from new renewables is cheaper than the power from fossil fuels. This is because, as more renewable energy is built, the price declines proportionally. This effect does not take place with traditional forms of energy generation, so we expect the price difference between costly fossil fuels and ever-cheaper renewables to become even larger in future. The UK government has confirmed that ground-mount solar is one of the cheapest forms of electricity generation and is readily deployable at scale.



Read more at:

- **https://ourworldindata.org/cheap-renewables-growth**
- **Powering up Britain' UK Government/Secretary of State (March 2023)**

Tackling climate change

Should we develop nuclear power instead of solar sites like these?

We need to develop multiple sources of low carbon energy in the UK to meet our net zero targets and tackle the climate crisis.

The government is clear: both nuclear and solar power need to be expanded together. This is reflected in national policy, which is strongly supportive of renewable energy, including solar. Additionally, nuclear takes decades to design, build and become operational, with a higher carbon footprint, whereas solar can be deployed swiftly.

To stay on track to meet our net zero targets, the UK needs to deliver a fivefold increase in solar generation by 2035.

Read more at:

- **UK Government DESNZ Powering up Nuclear – January 2024**
- **Little South Solar Farm PDAS (6.1.5 – 6.1.9)**
- **https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy#energy-plan-objectives-and-key-measures**

As this is being brought forward by a private company, will the solar energy produced benefit society?

The electricity generated at Little South will go directly into the National Grid, helping provide secure energy for UK consumers that is cheaper than fossil fuel alternatives.

This project is not subsidised by the government; Statkraft, like any commercial renewable energy developer, is taking on the risk associated with proposing a new solar development and in turn would receive future profits from the scheme.

However, this does not change the benefit of cheap, clean electricity to UK consumers. Statkraft also has more than 400 UK employees and the project itself will pay about £50,000 per year in business rates to Dover District Council, making significant contributions to the national and local economy.

Nature and ecology

Our proposals will not just benefit the environment by generating renewable energy and tackling climate change. We will deliver extensive benefits for local wildlife, protecting, enhancing and restoring habitats.

The planning application has taken account of, and mitigated, any potential impacts on a host of species that may be present in the area.

Little South will not be made up only of solar panels - 16 ha of the site, currently in arable use, will be set aside for a new Nature Restoration Area. Across the site, our plans will generate 20% biodiversity net gain for habitats, including habitat enhancements for protected species and 142% net gain in hedgerow habitat, significantly higher than national and locally set policy targets of 10%.

Over 55ha of land will also be converted to flood plain grazing marsh habitat, delivering more than 25% of the 22ha target for this vital habitat within the Stour Valley Biodiversity Opportunity Area.

Approximately 900 metres of new native species hedgerow will be planted creating much-needed habitats for wildlife and providing vital corridors for species such as bats, birds and bees.

Will the development cause a loss of habitat for wildlife?

The proposals will enhance biodiversity. We will ensure that Little South Solar Farm is a home for nature.

The Biodiversity Net Gain (BNG) Assessment that accompanies our planning application calculates that the development will deliver a BNG uplift of 20.83% for habitats, 17.33% for watercourses and 142.53% for hedgerows on the site. This significantly exceeds planning policy which requires of a minimum uplift of 10%.

Furthermore, our proposal includes the restoration of coastal and floodplain grazing marsh, a priority habitat in the local area. This will restore the land closer to its presumed original condition and create habitat for waterfowl, small mammals and a wide variety of invertebrates.

Read more at:

- **Little South Solar Farm PDAS (6.1.46)**
- **Little South Biodiversity Net Gain Calculation v. 1.2 FINAL**

Nature and ecology

Will the development affect the Local Wildlife Site (The Ash Level and South Richborough Pasture)?

Our plans will create and enhance habitat for the Ash Level and South Richborough Pasture.

Most of our site is covered by the Local Wildlife Site non-statutory designation. This is a blanket designation for 1037.7ha of land in the area, which either provides floodplain grazing marsh habitat or, as in the case of our site which is predominantly in arable use, has the potential to in the future.

Our plans will convert around 55ha of intensive arable farmland to grazing habitat, both within the solar arrays and within the Nature Restoration Area. Alongside our retention of the botanically rich ditch network, this will create new swathes of the priority habitat for the Local Wildlife Site, returning it closer to its presumed original condition in line with local policy.

There will be no significant adverse effects on any species or their habitat as a result of our proposals, as set out in detail in the Environmental Statement that accompanies the planning application. Rather, Little South Solar Farm will have a significant positive long term effect on the Local Wildlife Site and the species within it.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.181; 8.219; 8.231)**
- **Little South Solar Farm PDAS (6.1.49)**

Will local beaver populations be affected?

No.

Our expert ecologist found no evidence of beaver activity when surveying the site, and the Kent & Medway Biological Record Centre has no record of beaver populations within 2km of the site.

Read more at:

- **Appendix 8.1 Ecology Baseline Report (3.22)**

Will there be an impact on otter populations?

There will be no negative impact on otters.

There are records of otters within 2km of the site, the closest being 160m to the north east. Some of the larger watercourses on our site are suitable for foraging or commuting otters, but not for holt building which requires dense waterside woody vegetation which is not a habitat feature associated with our site.

We will retain and enhance the site's hedgerow, ditch and stream network, as well as create a nature restoration area. With these measures, our assessments conclude the development will have either a negligible or minor beneficial effect on otters.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.98 – 8.99, 8.224)**

Will bats be affected by the development?

There will be no negative impact on bat populations.

The site has been assessed by an ecologist for suitable nesting and roosting sites. No buildings are present on site and only one tree has a cavity suitable for bat roosting. Subsequent surveys in 2021 and 2023 found no evidence of roosting in this location.

Expert assessments have found that the site has low suitability for foraging and commuting bats, with suitable habitat that does exist concentrated mainly in the boundary features. Owing to the limited diversity of habitats and taking into consideration the bat data received from Kent & Medway Biological Record Centre, it is likely that activity is primarily associated with common bat species.

Our proposals include an extensive range of measures to preserve and support bats, retaining and enhancing the hedgerow, ditch and stream network, as well as creating a 16ha Nature Restoration Area. Our plans will support insect populations which act as a food source for foraging bats.

Little South Solar Farm will not be lit overnight during construction. During operation, the only lighting will be at the substation which will only be used during monitoring and maintenance if necessary outside of daylight hours. There will not be a significant impact on bats from light pollution.

The expert assessments of ecology submitted as part of the planning application conclude that the development will either have a negligible or minor positive effect on bats.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.95 – 8.97; 8.222 – 8.223)**

Nature and ecology

Will the development have an adverse effect on ‘red list’ breeding and wintering birds?

The proposals will be beneficial for birds.

We are taking extensive measures to avoid harm and improve habitat for wintering and breeding birds. Little South Solar Farm will create over 50ha of new habitat, focussed on the coastal and floodplain grazing marsh that local policy sets out is particularly needed in the area. We will also be taking the site out of intensive agriculture for 40 years and enhancing existing habitat on site. This will have a positive effect on local bird populations.

During construction, we will also take robust measures to prevent harm to wintering and breeding birds. Key habitat areas, such as hedges, trees, pond and watercourses will be protected and remain untouched by development activity. These areas will be protected by a buffer zone which vehicles will not be able to enter, preventing harm from dust and disturbance of ditches and hedges. Some areas adjacent to ditches and the Goshall stream will be fitted with dust sheeting to screen locations of particular importance for birds.

Any clearance of vegetation required by the development will take place outside of bird breeding seasons to avoid harm to skylark nests.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.239 – 8.243)**
- **Little South Solar Farm – NTS (8.3 – 8.4)**

Will there be an impact on water voles?

Little South Solar Farm will not harm water voles.

Many of the ditches on the site are suitable habitat for water voles and it is likely that they are present in the watercourses and the pond. However, by retaining the ditch, stream, pond and hedgerow network, as well as the creation of new grazing marsh habitat, our development will not cause harm to water vole populations.

In fact our assessments have found that the plans will have either a negligible or minor beneficial impact on water voles.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.100 – 8.101, 8.224)**

What will be the effect of the development on insects?

We will boost insect numbers at Little South.

The areas of the site that provide valuable habitat for insects, such as the ditch network and vegetation, will be retained. However, the part of the site that is intensively farmed does not suit insects and other invertebrates.

By replacing 55ha of intensively-farmed arable land with low-intensity grazing, and the establishment of a nature restoration area, the development will boost insect numbers. Furthermore, Statkraft works with the Bumblebee Conservation Trust to enhance, create and restore bumblebee habitats, which would be impossible if the site remained in intensive agricultural use.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.114, 8.120 – 8.134)**

Will there be an impact on small mammals such as brown hare, hazel dormouse and hedgehogs?

There will not be a negative impact on small mammals.

The land currently has some habitat for hedgehog, brown hare, and harvest mouse, and some limited suitability for hazel dormouse. Hedgehog may be present along the southern hedgerows of the site, but the boundary ditches and lack of dense vegetation make foraging difficult.

Through the retention of existing habitat features, such as hedges, ditch and stream networks, and the creation of new habitat, our experts’ assessments conclude that there will not be a negative impact on small mammal species.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.103, 8.224)**

What will be the effect of the development on amphibians and reptiles?

Our plans will not harm amphibians and reptiles.

There are some ponds outside, but close to, our site, which are suitable for great crested newts. We will take measures through construction to make sure that the construction of Little South Solar Farm is unlikely to cause significant harm to these amphibians. This includes careful clearance of arable farmland within 250m of the ponds and phased approach to any required grassland cutting.

Overall, the retention of key habitat features on-site, including the ditch and stream network, will help ensure that there is either a negligible or slightly positive effect on any present amphibians and reptiles.

Read more at:

- **ES Little South Solar Farm - Chapter 8 (8.95 – 8.97; 8.222 – 8.223)**

Heritage and archaeology

Our plans aim to protect local heritage whilst delivering clean energy for the future.

We have incorporated feedback into our plans from experts including Historic England, English Heritage, Kent County Council and Dover District Council Conservation Officer to ensure that much-needed renewable energy can be delivered whilst respecting the historic environment. This included:

- increasing the distance of panels from Richborough Roman Fort to over 500 metres from the amphitheatre and over 1km from the fort
- reducing the height of the panels from 4.46m to 2.7m.
- plans for 900 metres of new native species hedgerow, helping to restore historic character of the surrounding countryside while creating much needed habitats for wildlife and providing vital corridors for species such as bats, birds and bees.

Is it true that the site is only 160m away from a Scheduled Ancient Monument?

The Nature Restoration Area at the northern side of our site is within 160m of the boundary of the Richborough Scheduled Monument, but any solar development would be nearly half a kilometre away.

In response to feedback, we have reassessed the distances between our site and the monument. The southern boundary of the 'scheduled ancient monument' land is, at its closest point, 159m away from the northern boundary of the 'Nature Restoration Area' which is part of our site. Throughout the planning process, and in consultation with independent heritage experts, we have sought to design our plans to respect the heritage of Richborough's Roman fort and amphitheatre.

We have made sure that there is a significant zone where no development will take place between the site boundary and the start of the solar infrastructure. This will make sure that panels and other structures are at least 482 metres away from the edge of the scheduled monument designation boundary.

When compared to the locations of the key features at the scheduled monument, our plans will ensure that any solar development is:

- At least 588m from the amphitheatre
- Over 1km (1,084m) from the fort.

Read more at:

- **ES Little South Solar Farm - Chapter 6 Archaeology (6.50)**
- **Land Use Parameter Plan with Distances - Drawing Number: 35394 LN-P-02**

Is the site adjacent to, and in full view of, Richborough Roman Fort?

The solar panels and other infrastructure will be over 1km away, and not visible from the Roman fort.

The closest distance between any solar development and the fort is 1,084m. As shown on the views below, the visibility between the site and fort is very limited. Our detailed landscape assessments have found that the overall effect and significance of the completed development on the fort will be of a minor, and temporary, adverse impact.

Existing view showing perspective from the Scheduled Ancient Monument

15 year view showing perspective from the Scheduled Ancient Monument with development

Read more at:

- **Land Use Parameter Plan with Distances – Drawing Number: 35394 LN-P-02**
- **Figure 7.5 Visual Appraisal Plan with Zone of Theoretical Visibility**
- **ES Little South Solar Farm – Chapter 7 Landscape and Views (7.110 – 7.191)**
- **ES Little South Solar Farm - Chapter 10 Built Heritage**

Heritage and archaeology

Will the development affect the setting of the Richborough Scheduled Monument?

The solar farm will introduce a change to the landscape but would not be a prominent feature.

The setting of the fort and amphitheatre is already very different to its original position in the landscape. There is significant nearby industrial development to the east, on land that formed the ancient coastline. Additionally, what was once the Wantsum Channel is now reclaimed agricultural land.

There is an existing industrial estate to the east of the Scheduled Monument

Nevertheless, we have worked extensively to minimise any effects of Little South Solar Farm on the setting of the scheduled monument. Panels and other infrastructure have been positioned as far away as possible within the site, and the Nature Restoration Area serves as a significant and effective landscape buffer.

Our plans have changed in response to feedback. Following pre-application consultation, we changed our proposed panel type from 'trackers' – which follow the sun throughout the day – to fixed, reducing the height from 4.46m to 2.7m.

We have engaged extensively with Historic England and Kent County Council, agreeing assessment criteria in advance of our planning application. Overall, this work has concluded that the effect of our proposals on cultural heritage assets is not significant, assessed to be at the lower end of less than substantial harm.

Following feedback from consultees, we have alse amended the proposals to realign the access to the Nature Restoration Area, providing a viewing corridor to and from the Scheduled Monument across the former Wantsum Channel.

Existing view showing perspective from Richborough Scheduled Monument

15 year view showing perspective from Richborough Scheduled Monument

Read more at:

- **Little South Solar Farm PDAS (6.1.29 – 6.1.30)**

Will views from the Scheduled Monument be damaged by the solar farm?

The solar farm will be nearly half a kilometre away from the Scheduled Monument and nearly 600 metres from the site of the amphitheatre. It will not be possible to see the solar farm from the Roman fort, which over 1km away,

Little South Solar Farm has been designed to integrate into the flat low lying landscape, with a significant buffer from the Scheduled Monument.

We have designed the development to reinforce the landscape pattern of the local area, retaining ditches and vegetation and creating a substantial new landscape buffer on the northern and eastern edges of the site, setting the scheme back from the Wantsum Channel.

The overall effect of our landscape plans will be help the solar farm blend into the existing field pattern.

Read more at:

- **ES Little South Solar Farm – Chapter 7 Landscape and Views (7.187)**

There may be a Roman road underneath the site – is this true?

Following suggestions that there could have been a Roman Road running underneath the site, we undertook extensive investigations to search for evidence.

This work has conclusively found that there is no Roman Road crossing the site.

Read more at:

- **ES Little South Solar Farm - Chapter 6 Archaeology (6.52)**
- **Appendix 6.2 Archaeological Impact Assessment Part 1 (6.4.11)**

Heritage and archaeology

Will the development affect possible archaeology on the site?

We have listened to the feedback and concerns relating to the potential for harm to important buried archaeology due to the legs which secure the solar panels in place. As a result, we have recently undertaken a full set of archaeology surveys, ending with targeted trial trenching in ten locations across the application site.

These studies have confirmed that there is no evidence for a Roman road crossing the site, and conclude that "development impacts are not considered to be so significant that they would warrant refusal of consent for a scheme".

Read more at:

- **Appendix 6.2 Archaeological Impact Assessment Part 1 (10.1.1-10.1.4 , 11.3-11.4)**

Landscape

We have worked to ensure that Little South Solar Farm has a limited landscape impact, and respects and reinforces the traditional landscape character of the area. The site is low-lying, which helps limit views, and sits within an already-disturbed area, with nearby industrial development, overhead power lines and pylons and major roads.

Additionally, a substantial landscaped buffer to the north and east will screen views and provide habitat for wildlife.

LEGEND

Site Boundary
Existing Water Courses and Water Features xxx
Contours/Spot Heights (Metres AOD) ^
Public Rights of Way *
Sustrans Cycle Route +
National Trails / Long Distance Walks ##
Listed Buildings ~
Scheduled Monument ~
Existing Tree and Scrub
Solar Panel Layout
Reinforced Hedgerow
Proposed Suds
Proposed Drainage Ditch with Reed Beds
Proposed Reed Beds
Retained Wildflower Grassland
Over Head Power lines and Easement
Existing Reed Beds and Drainage Systems

Landscape masterplan

Landscape

What will be the impact on the natural landscape and setting of the area?

There is already extensive industrial and urban development in the local area. It is low lying, with limited visibility, and is not a protected landscape.

We have designed our proposals to accord with national and local policy which requires that development has a minimum impact on the open countryside and landscape character.

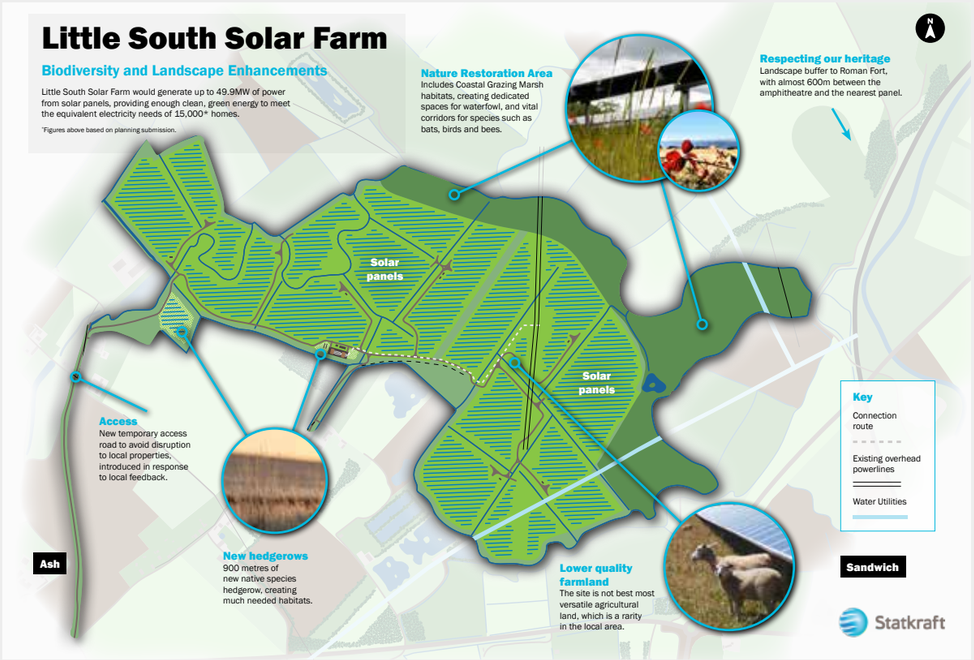
To demonstrate this, we have considered the landscape and visual impacts through construction and the first ten years of operation of the solar farm.

To achieve the minimum possible landscape impact, we will retain and reinforce the landscape pattern of the area, retaining hedges, vegetation and ditches.

The substantial landscape buffer to the northern and eastern sides of the development will set the scheme back from the Wantsum Channel.

Our landscaping approach will restore the visual interest and the ecological diversity of the river channel, and the nature restoration area will create willow carr and wet woodland, a priority habitat, providing separation separation between the solar farm and its immediate setting. This restored landscape would have been typical of the Wantsum Channel before it silted up.

Overall, we will not cause unacceptable impacts on the landscape character, and the development has the potential to improve the landscape structure of our site.



Read more at:

- **NPPF (Paragraph 174a)**
- **Dover Local Plan Policy DM16 (Landscape Character)**
- **ES Little South Solar Farm – Chapter 7 Landscape and Views (7.190)**

Have you considered the visual impact on views of Richborough Bluff from the south?

Yes. The development will have a minor impact on views from this Landscape Character Area.

Only limited parts of the south eastern edge of Richborough Bluff have visibility of the site. .

Once Little South Solar Farm is constructed, the landscape buffer to the north and east of the site will limit the impact on the setting of the wider landscape. Our strategy will establish characteristic landscape features that reflect the LCA's character. Although located outside, these will include wet woodland, field drainage ditches, grassland and reedbeds.

Once the new planting and landscape buffer has time to mature, visibility of the site would be further reduced from Richborough Bluff, with an overall neutral effect by year 10 of operation.

Read more at:

- **Little South Solar Farm Appendix 7.5: Landscape Effects Table**

Statkraft | Little South Solar Farm

Landscape

Will the development alter the historic landscape, particularly from higher areas such as footpaths (EE92A) and (EE97)?

The effect on views from these footpaths will be minor within the context of the existing industrialised landscape, which includes pylons, discovery park, main road, and energy centre nearby.

For a limited time during construction, plant and vehicle movement might be slightly visible from a small part of the overall views. Our landscape assessment has found that the overall effect during construction will be of a very small magnitude impact of negligible significance.

Once constructed, there will be partial views over the centre of the site. The flat nature of the land, with mature vegetation, will restrict views of the development, particularly when plants are in full leaf. At most, this will cause a negligible adverse impact on views.

By the time that new planting has matured, the scheme will be assimilated within the landscape. Our experts' assessment concludes that at year 10 of operation, Little South Solar Farm will be barely perceptible.

Read more at:

- **Little South Solar Farm Appendix 7.6: Visual Effects Table**

Will this create an industrial zone between Sandwich and Ash?

No – we will not create an industrial zone between the two settlements.

The nearby industrial landscape of the Discover Park and Richborough Energy Centre is very different from a solar farm. Our site will have minimal and temporary footprint on the landscape, unlike the major permanent impact of industrial; development, with hardstanding, large buildings and associated noise, lighting and dust.

Farming practices such as grazing can continue at Little South, and we will enhance nature and biodiversity as a result of the plans. Additionally, the solar farm will likely improve the land condition at the end of the project, at which time the land will be returned to agriculture.

Will the solar panels cause glint and glare?

Expert assessments show that the development will not cause unacceptable glint or glare.

Glint occurs when a momentary flash of bright light is visible as a result of movement, while glare is a continuous source of bright light from static receptors or large reflective surfaces.

Overall, solar panels are designed to absorb, and not reflect, as much light as possible. However, to make sure that there are no unacceptable impacts on local people, we have carried out a thorough modelling exercise to assess any glint or glare impacts.

From local roads, including the A257, Ash Road, and the A256, the existing vegetation significantly restricts views of panels. There are no predicted significant impacts on the operation of the railway, with no mitigation required.

We assessed possible impacts on 62 dwellings in the area surrounding the site. The overwhelming majority will be screened by existing vegetation and/or terrain, meaning that no mitigation is required. There is one dwelling where glare is possible within a window of less than one hour a day for no more than three months of the year. Therefore, the overall impact on residential amenity is assessed to be low.

The modelling has also found that there are no unacceptable impacts on approach paths for Ripple Airfield.

Read more at:

- **Glint and Glare Study Part 1 and 2**
- **Little South Solar Farm PDAS (6.177 – 6.1.83)**

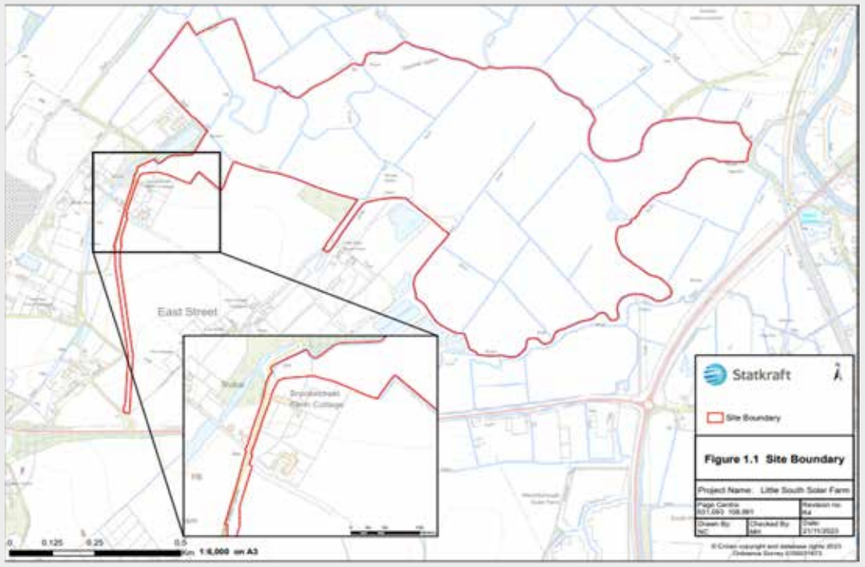
Access and transport

Once operational, Little South Solar Farm will attract very little traffic as the site does not require a permanent on-site presence. During construction and decommissioning, the access to the site and hours of deliveries will be closely controlled to minimise any impact to the local community.

We took time to specifically consult the residents closest to the site on the access arrangement for the solar farm. As a result of feedback from our initial programme of consultation, we developed plans for a temporary access road to take construction traffic away from Cooper Street Drove.

Will the development cause damage to the road network?

We will minimise impacts on the road network through construction and decommissioning, including through the provision of a temporary access road.



Before construction, we will survey the condition of local roads, which will be repeated once the development is complete. This will identify any damage caused by the construction, if any, which we would then fix.

We will minimise the risk of vehicles bringing mud onto the local roads by carrying out compulsory wheel washing for all construction traffic leaving the site.

Read more at:

- **Transport Statement (5.33)**
- **Construction Traffic Management Plan**

Would any damage be repaired?

Yes. Any damage caused to the roads by construction traffic would be repaired.

Are local roads too small to accommodate construction traffic?

No – we have assessed local roads to ensure they are suitable for construction traffic.

Our plans include measures, such as a temporary access road, that will minimise impacts during the construction period. The route for vehicles to take to site has been specifically selected to alleviate traffic congestion around tight bends on Cooper Street Drove, decreasing risk and inconvenience for local road users.

Read more at:

- **Construction Traffic Management Plan**

What would be the impact on Brooke Street residents from construction traffic?

We do not anticipate the construction of the scheme having a major impact on residents on Brooke Street. Construction traffic will be routed through the temporary access road to avoid the tight bends on Cooper Street Drove, and will not use East Street, so that residents can travel without significant disruption.

Will there be any loss of recreational space for residents and any closures of Public Rights of Way?

The land is not currently accessible by the public, with no rights of way running through the site.

There is a network of Public Rights of Way surrounding the site, including routes passing through the local landscape to the north south and west. Access to these will not be lost as a result of the development of Little South Solar Farm.

Following feedback from consultees, we have also amended the proposals to realign the access to the Nature Restoration Area, providing a wide viewing corridor to and from the Scheduled Monument across the former Wantsum Channel.

Read more at:

- **Little South Solar Farm PDAS (2.2.2)**
- **ES Little South Solar Farm – Chapter 7 Landscape and Views (7.54)**

Drainage

Little South Solar Farm can be developed without significantly increasing surface water runoff, and will not increase the risk of flooding off-site.

There is an existing system that will remain in place that uses dykes and sluice gates to manage water levels and flow into the River Stour.

By contributing to the decarbonisation of our electricity network, our development will play its part in fighting climate change and the extreme flood events it causes.

Is this site at risk of river flooding? Will flood risk be worsened by the scheme?

Solar farms do not increase surface water runoff.

Research from the Intergovernmental Panel on Climate Change has found that our dependence on fossil fuels is causing more extreme weather events, including flooding. Little South Solar Farm will contribute to the decarbonisation of the electricity network and fight against the climate crisis.

The west of the site lies in Flood Zone 1 – the lowest categorisation of river or sea flood risk. The east of the site is in Flood Zone 2: a 'medium probability' of flooding. Historic flood records show that the south east of the site has experienced river flooding in the past. This part of the site has been dedicated to the landscaped buffer, with no infrastructure allowed.

Overall, Little South Solar Farm is at low risk of river flooding. Solar farms are categorised as 'Essential Infrastructure' by national planning policy, which are considered appropriate uses for flood zones 1 and 2. Solar is a land use which would be wholly unaffected by the predicted levels of flooding.

Read more at:

- **Flood Risk Assessment and Drainage Strategy Part 1 (3.4; 8.1.3 – 8.1.10)**
- **Seneviratne, S.I., X. Zhang, M. Adnan, W. Badi, C. Dereczynski, A. Di Luca, S. Ghosh, I. Iskandar, J. Kossin, S. Lewis, F. Otto, I. Pinto, M. Satoh, S.M. Vicente-Serrano, M. Wehner, and B. Zhou, 2021: Weather and Climate Extreme Events in a Changing Climate. In Climate Change 2021: The Physical Science Basis. Contribution of Working Group I to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [Masson-Delmotte, V., P. Zhai, A. Pirani, S.L. Connors, C. Péan, S. Berger, N. Caud, Y. Chen, L. Goldfarb, M.I. Gomis, M. Huang, K. Leitzell, E. Lonnoy, J.B.R. Matthews, T.K. Maycock, T. Waterfield, O. Yelekçi, R. Yu, and B. Zhou (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, pp. 1513–1766, doi:10.1017/9781009157896.013.**

Will surface water flood risk be increased?

There will be no notable increase in surface water runoff.

There is no record of surface water flooding on the site, according to the Environment Agency, Dover District Council and Kent County Council. There is an extensive drainage ditch network throughout the site which accommodates surface water runoff.

We will ensure that surface water is sustainably managed using sustainable drainage techniques, particularly in the small number of concrete areas required for the High Voltage compound.

Read more at:

- **Flood Risk Assessment and Drainage Strategy Part 1 (3.6; 8.1.5)**

Drainage

Have you calculated the impact of increased rainfall due to climate change in your drainage calculations?

Yes – we have considered the impact of climate change when assessing flood risk.

All sustainable drainage features have been designed to accommodate runoff from a 1 in 100 year storm, plus a 45% additional allowance for the impact of climate change.

Read more at:

- **Flood Risk Assessment and Drainage Strategy Part 1 (8.1.7)**

Could flooding damage the solar farm?

We do not expect the solar panels to be at risk of flooding, but they are able to continue to operate during a flood.

The scheme has been designed to be fully compliant with national and local policy, including consideration of the impact of climate change.

Read more at:

- **Flood Risk Assessment and Drainage Strategy Part 1 (8.1.10)**
- **Little South Solar Farm PDAS (6.1.40)**

Community impact

We are pleased to establish a community benefit fund in areas where we operate solar farms. This fund is dedicated to projects that help meet the aims of local communities to make a positive difference.

This could include initiatives such as:

- Improving local infrastructure such as EV charging and new walking and cycling routes
- Energy efficiency projects
- Upgrading community buildings
- Funding local sports groups
- Improving local biodiversity
- Skills and education programmes

Additionally, we welcome the opportunity to work with local suppliers and sub-contractors both on the solar farm and when delivering community projects.

How has the money for the community benefit fund been calculated and is this in line with other projects?

Statkraft has recently increased the amount available for community benefit funding for our pipeline of solar projects, to £400 per installed MW. At Little South, this will equate to £19,900 per year, or £796,000 over the lifetime of the development.

The funding will also increase in line with inflation throughout the lifetime of the project, so that the value of the investment into the local community is protected over the years to come. Local representatives will be involved in deciding how the money will be spent.

Additionally, we encourage local businesses to register as potential suppliers to the solar farm and will work with business representative groups to increase awareness of opportunities.

Read more at:

- **Statement of Community Involvement (5.2)**

What will be the impact on local tourism?

Little South won't have a negative impact on local tourism.

As previously mentioned , Little South Solar Farm will not create significant harm to the scheduled ancient monument. Furthermore, the local landscape is already characterised by industrial development, major roads, and pylons.

Our site isn't accessible by the public and the development will not cause major visual harm from local footpaths. The scheme will be screened by existing and new vegetation and we are confident that tourism will not be affected by the proposals.

Community impact

Are there any direct local benefits to the scheme?

We are proud of the range of benefits that the scheme provides, including improvements to the environment, local economy, and communities.

We have summarised the benefits in the table below:

- Conservation of existing and creation of new habitats to boost nature and biodiversity
- Restoration of 55ha. of important coastal and floodplain grazing marsh habitat
- No loss of Best and Most Versatile agricultural land
- Restoration of soil quality over life of the development
- Work with the Bumblebee Conservation Trust to enhance, create and restore bumblebee habitats, which would be impossible if the site remained in intensive agricultural use.

- Little South Solar Farm will feed renewable energy into the local grid network
- A community benefit fund of £19,900 per year for local community projects
- The Nature Restoration Area will include birdwatching apparatus and will be accessible to groups, including local schools, for pre-arranged visits.

- We are keen to use local suppliers and sub-contractors where possible, supporting Kent's economy.
- The scheme will contribute significant sums to business rates, supporting the financing of local councils.
- Energy generated from the solar farm will reduce dependence on expensive fossil fuel imports.
- By renting the site for the duration of the solar farm's life, we will help secure a sustainable future for a local agricultural business.
- Solar development increases the UK's energy security and resilient to global shocks.

Construction and decommissioning

The solar farm is a temporary development. We will act as responsible custodians of the land and restore the site to agricultural use at the end of the scheme's lifespan. During construction and decommissioning periods, we will abide by best practice, minimising the impact on local residents and respecting the wellbeing of our neighbours. We will regularly engage with local people and community representatives throughout construction to share updates and enable community representatives to ask questions and raise issues.

Will the frames and panels ever be removed?

Yes – solar development is temporary and entirely reversible.

At the end of the 40 year operational lifespan, the solar farm will be decommissioned, dismantled and removed and the site returned to agricultural use. This includes the removal of the piles, frames and cabling.

Where possible, components will be reused and recycled. Where this is not possible, any waste generated will be removed and transported by a certified and licensed contractor.

A full decommissioning report will be produced in accordance with prevailing good practice at the time.

Read more at:

- **Little South Solar Farm PDAS (2.5.19-2.5.20)**
- **Little South Solar Farm NTS (5.6)**

Will the temporary access road take prime agricultural land out of production?

The temporary access road is vital to avoiding congestion from construction traffic on Cooper Street Drove.

The creation of the road will cross grade 2 farmland and remove a small strip from production for 12-18 months. However, this is a short period of time and we believe it is a worthwhile and necessary measure to reduce impact on residents and road users.

The land on either side of the road will remain open for farming use throughout the construction. Once development is complete, the temporary road will be fully returned to its original state.

Once the solar farm is operational, all access to Little South will be via East Street. traffic would only include small maintenance vehicles and those accessing the nature restoration area.

Read more at:

- **Transport Statement (4.2)**
- **Little South Solar Farm PDAS (2.5.8 – 2.5.10)**
- **Figure 3.1 Site Layout Plan**
- **Construction Transport Management Plan**

Construction and decommissioning

Is it true that the solar farm will need 43,125 blocks of concrete ballast in the construction process?

No, this figure is incorrect.

The installation of solar panels mostly involves galvanised steel pegs being driven into the ground, not concrete ballast. These pegs will typically be driven 1.5-2m deep, and do not require concrete.

Ballast is a relatively expensive method of installation and is avoided wherever possible, but may be used in very limited areas where piling is inappropriate. Minimal concrete will be used during construction and any that is required will be sourced locally.

Any concrete used will be laid on the ground so that it can be removed at the decommissioning stage and used elsewhere.

Read more at:

- **Little South Solar Farm – Outline CEMP (3.3)**
- **ES Little South Solar Farm – Chapter 3 Site and Development (3.15)**

What will happen to the infrastructure after 40 years? Will it be left in place or sent to landfill?

Little South Solar Farm is temporary and entirely reversible.

After operating for 40 years, the solar farm will be decommissioned and can be returned to agricultural use. All infrastructure, including modules, mounting structures, cabling, inverters and transformers would be removed, re-used, recycled, or disposed of in accordance with the best practice at the time.

A decommissioning plan for the development will be required by planning condition, which will set out details of traffic management and reinstatement works at the end of the solar farm's life.

Read more at:

- **ES Little South Solar Farm - Chapter 5 Construction (5.47)**
- **Little South Solar Farm PDAS (2.5.21)**

Can solar panels be recycled?

99% of a solar panel is recyclable.

There are well-established industrial processes to recycle panels. A solar panel is made of a frame (typically aluminium), glass, crystalline silicon solar cells, and copper wiring, all of which can be extracted, separated, and recycled or reused. The remaining one percent is a material which bonds the layers of a panel together.

There are specific organisations, such as PV Cycle and the European Recycling Platform, that work with solar developers to minimise electronic waste and maximise solar recycling in line with the Waste from Electronical and Electronic Equipment (WEEE) regulations. Statkraft will work with these organisations wherever possible.

Have you considered the environmental impact of construction?

We have considered the environmental impacts in detail.

Where needed, we will mitigate any impacts caused by the development, so that Little South Solar Farm causes no significant harm and delivers benefits wherever possible.

We have considered the broad local environment when planning construction, including habitats, designated sites, protected species and local habitat. Through careful study and planning of mitigation, we are confident that there will be no significant harm arising from the construction of the development.

Read more at:

- **ES Little South Solar Farm – Chapter 5 Construction**
- **ES Little South Solar Farm – Chapter 8 Biodiversity (8.210-8.217)**
- **Little South Solar Farm – NTS (11.3.1)**

Materials and operation

Solar power is proven to be a safe and effective technology that is playing an important role in tackling the climate crisis. Once operational, Little South will be an unobtrusive addition to the local area and become carbon negative within five years of operation.

Will panels come from China? Is this sustainable and do you consider human rights?

Ensuring human rights are protected throughout the supply chain is an absolute priority for Statkraft.

While the importation of solar panels is essential to meet the demands of the expanded role that solar plays in the UK's energy mix, Statkraft is committed to sustainable and responsible business practices, and this commitment extends to our suppliers. Our procurement activities are guided by the OECD Guidelines for Multinational Enterprises and the OECD Diligence Guidance for Responsible Business Conduct. We organise our procurement activities to obtain the best possible value, terms and conditions, and avoid adverse impacts to people, society, and the environment in our supply chains.

The main components for solar are the panels themselves, with polysilicon as the key input material, and inverters. Statkraft is aware of the risk of forced labour in the solar supply chain. Statkraft strongly opposes the use of forced labour and we have implemented measures to address the risks through traceability obligations and audit rights. Contracts are only awarded to suppliers that deliver solar module materials from factories that are open to audit. We do not buy materials from factories that are not transparent and do not allow insight into their supply chain.

Addressing the risks related to forced labour in the supply chain is complex and individual companies' efforts are important but not enough in themselves to address the challenges. Therefore, Statkraft also works with industry associations and peers to raise awareness, increase transparency, and improve industry standards for PV panels and other solar equipment.

Statkraft is a signatory to the Solar Stewardship Initiative, which seek to ensure the energy transition is just, inclusive and respects human rights.

Read more at:

- **Statkraft Website, Responsible Supply Chain: https://www.statkraft.com/sustainability/our-approach-to-sustainability/responsible-supply-chain/**

Will the panels leak chemicals into the soil?

Solar panels do not leak chemicals and do not pose a risk to the local environment.

There have been unsubstantiated and incorrect claims made about chemicals in solar panels and the effects they have on human health and the environment. There is robust evidence to show that these suggestions are unfounded and that solar panels are safe for humans and the natural world.

Read more at:

- **Mirletz, H. et al. (2023) "Unfounded concerns about photovoltaic module toxicity and waste are slowing decarbonization," Nature Physics, 19(10), pp. 1376–1378. Available at: https://doi.org/10.1038/s41567-023-02230-0.**

How much embodied carbon will be in the development and how long will it take to become carbon neutral?

A solar farm becomes carbon neutral within its first four years of operation, and carbon negative thereafter.

While some carbon is emitted in the manufacture and transportation of solar panels – as with all manufactured products – claims that solar panels produce more carbon than they save are false. Research has shown that the carbon payback period for solar panels is on average 1-4 years.

When compared to different energy sources, a 2017 study published in the academic journal Nature found that the energy needed to build a power source in the first place, is "significantly higher" for fossil fuels than solar.

Read more at:

- **https://www.nrel.gov/docs/fy04osti/35489.pdf**
- **Pehl et al. (2017) Understanding future emissions from low-carbon power systems by integration of life cycle assessment and integrated energy modelling, Nature Energy**

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Materials and operation

Will the solar farm increase background noise?

Noise from the operation of the solar farm will not be heard outside the site.

Solar farms produce a relatively low level of noise that is only heard in close proximity to the noise sources themselves – usually the fans on the inverters on-site. These components will be located at the ends of the solar panels strings furthest away from residential properties.

A Noise Assessment Report has been produced by Wardell Armstrong to accompany the application. The assessment considers the potential noise generation from the plant associated with the Development, with respect to existing sound levels in the area.

In agreement with Dover District Council Environmental Health Department, it was agreed that noise levels should not exceed existing background noise levels at any sensitive properties or location.

The predicted operational noise levels are within the lowest category of impact under the agreed assessment criteria at all times of the day or night.

Read more at:

- **Little South Solar Farm PDAS (6.1.72 – 6.1.76)**
- **Little South Solar Farm Noise Assessment Report (7.1.1 – 7.1.3)**

Is there a fire risk associated with any Battery Energy Storage Systems on the site?

The proposals do not include a Battery Energy Storage System.

In response to feedback from consultees and residents, plans for a BESS component of the project were removed at the pre-application stage.

Read more at:

- **Little South Solar Farm PDAS (2.5.22)**

Statkraft

Little South Solar Farm

You can find out more at **projects.statkraft.co.uk/Little-South-Solar-Farm**