



August 2022

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22/501335/FULL Land North of Little Cheveney Farm, Sheephurst Lane, Marden, Kent

Detailed Response on Key Issues: Landscape, Noise, Glint and Glare, Construction Traffic Management, Heritage and Site Security

Project: Sheephurst Solar Farm **Country:** UK

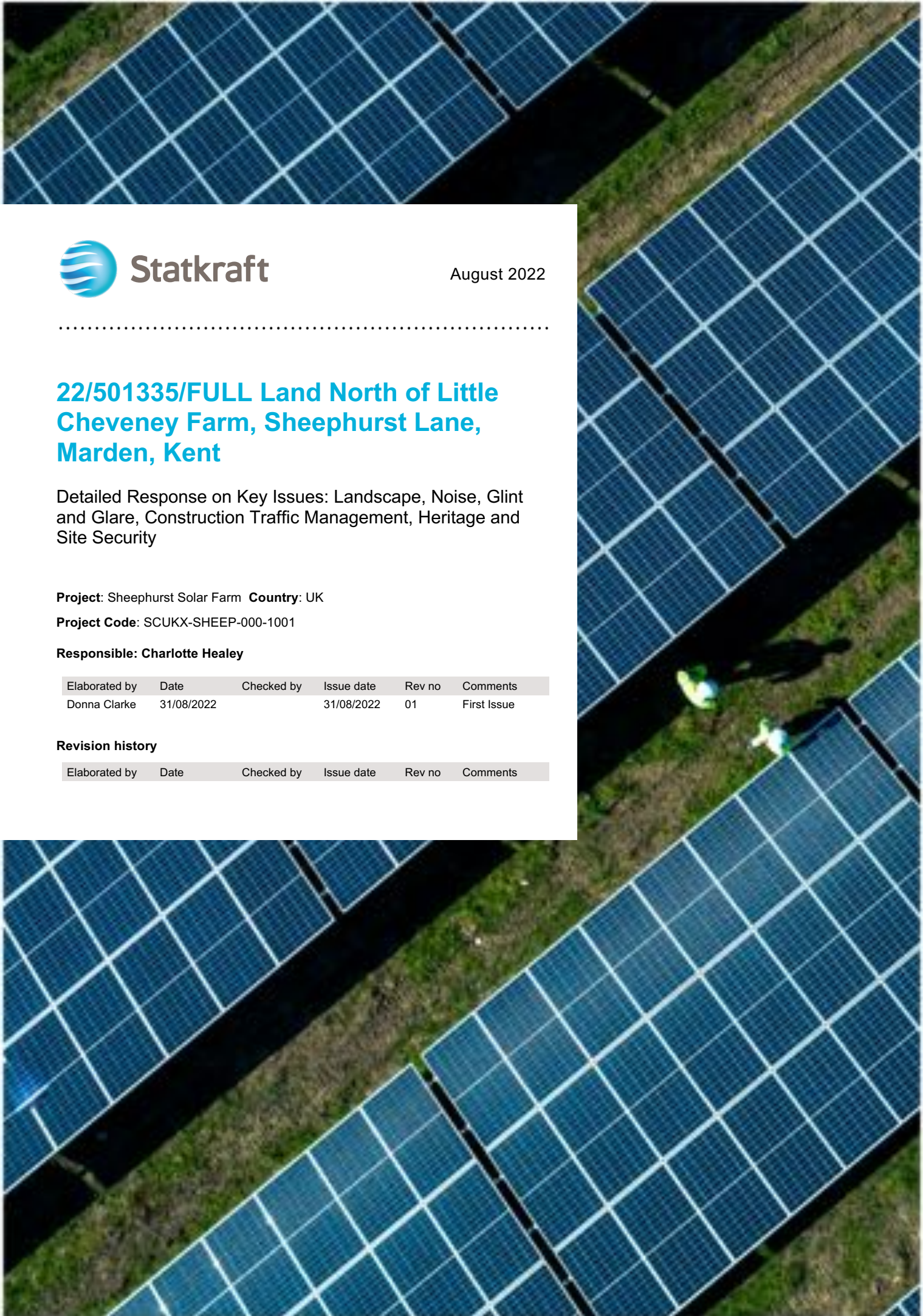
Project Code: SCUXX-SHEEP-000-1001

Responsible: Charlotte Healey

Elaborated by	Date	Checked by	Issue date	Rev no	Comments
Donna Clarke	31/08/2022		31/08/2022	01	First Issue

Revision history

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1 Landscape and Visual Impact

Credibility

A concern raised in the public consultation is that the LVIA is misleading and does not take into account residential homes and private land and that the report lacks credibility.

There is no misleading evidence with respect to the LVIA. The report has been prepared by a Chartered Landscape Architect with over 15 years relevant experience. All mapping data is up to date and is purchased from the most recent OS data sets. Dwellings have not been excluded from the study but access to private dwellings is not possible unless a PROW or public road passes the dwellings.

Impacts from dwellings has been undertaken, where possible, from within close proximity to them, or extrapolated based on their visibility across the site from publicly available viewpoints. Dwellings assessed are discussed within the LVIA report in paragraphs 4.52 to 4.60 and further assessed in paragraphs 6.48 to 6.60.

It should also be noted that the Guidelines for Landscape and Visual Impact Assessment, paragraph 6.16 states:

“The viewpoints from which the proposal will actually be seen...should then be identified. They may include:

- *Public viewpoints...*
- *Transport routes*
- *Places where people work.”*

Public Footpaths - Disruption

Whilst the public right of way traverses the corner of the north eastern field of the site, users of the public footpath walk around the north eastern corner of the field and avoid traversing the field. It is the applicant's intention to apply to divert the footpath to formalize this route around the field. In addition the applicant will create permissive footpaths to the west and east of the site thereby creating greater connectivity with existing public rights of way within and outside the site boundary.

Impact on Ancient Woodland

Arable farming is currently undertaken up to the edge of this Ancient Woodland to the west of the site. A minimum 30m buffer is proposed between the edge of the woodland and the site.. Additional woodland to the north and south of the Ancient Woodland is also proposed to reconnect this woodland to the surrounding landscape as it is currently an island within the landscape.

Proposed boundary hedgerows

All proposed boundary hedgerows are outside the fenced boundary of the solar energy farm. This is shown on drawing AW0143-PL-002 Proposed Mitigation, Landscape & Ecology Enhancements.

Solar Panels

The LVIA and photomontages have been produced on the basis of the solar panel heights as shown on drawing 27899/SK01 Rev 0.

Landscape Assessment and BESS and HV Compound

The LVIA discusses the BESS and the HV compound. These include Viewpoint 2, paragraphs 6.8-6.12; Viewpoint 3, paragraphs 6.13 to 6.16; and Viewpoint 10 from dwellings on Shephurst Lane, paragraphs 6.41 to 6.45 of the LVIA. Section 7 Mitigation also discusses planting around these structures.

A number of comments state that the HV compound is located next to cottages. This information is incorrect, the HV Compound is located approximately 115m from No 8 Little Shephurst Cottage and approximately 123m from No 7

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Little Sheephurst Cottage. It has been located in an area where it is considered to have the least visual effect from numerous receptors, where it is mostly screened from view and can be mitigated with additional vegetation.

The HV compound is not been shown on photomontages because it is not visible within the viewpoints and photomontages as it has been located in an area with least visibility. It would also not be visible through the solar panels and mitigation planting. A photomontage was not possible from the entrance driveway of 8 Little Sheephurst Cottage, as it would have required trespass on land to undertake survey work. As stated within the LVIA, the likely visibility of the HV compound from Viewpoint 10 is negligible-low and medium from upstairs windows. This will be mitigated with substantial buffer planting around the HV compound.

The BESS has been removed from the proposal.

Willow Cottage

Willow Cottage, the bungalow located to the east of the development, is 35m and not 15 from the security fencing which is a deer fence. Distance to the solar panels from Willow Cottage is approximately 55m. There will be a significant woodland buffer along the boundary which will screen the fence and the solar panels.

AONB

The impact on the AONB was assessed. Viewpoint 11 of the LVIA was the only potential publicly available viewpoint from where the solar energy farm may have been visible. Substantial existing vegetation screens the solar farm from the viewpoint.

Little Cheveney Farm

Trees and woodland will provide visual screening. During the winter months when the trees drop their leaves Little Cheveney Farm may have a filtered view of the solar energy farm, however the visual effect would not be significant due to distance and the layering of vegetation between Farm and the solar panels.

Red Line Boundary

The site boundaries are correct. Agreements have been made between the landowner and Statkraft to provide additional woodland planting on the land adjacent to the south east corner of the site, outside of the site boundary. Mitigation buffer planting within the site boundary is of substantial depth of 15m. The additional woodland outside of the site boundary has been included within the assessments.

Cumulative Impact

The distance between the red line boundaries of Sheepwash and Bockingfold sites on a plan is approximately 700m, however, travelling by road the distance would be approximately 1.4km and via PROW with some walking on main roads, approximately 900m.

There is no combined visibility between the sites, i.e. Bockingfold is not visible from Sheepwash and vice versa. Sequential views are over a longer distance, such that nearly 1km would be walked between the two sites, although this PROW would pass an approved Switching Station. The PROW does not connect to any other PROW unless a distance is walked on roads. The solar energy farms and the switching station would be seen one after another over a distance of up to 500m and would be occasionally successional. The cumulative occasionally successional effects would have a low magnitude of change on a high sensitivity receptor (PROW), with a Moderate Adverse significance of effect. This does not take into account mitigation planting which would reduce this effect over 10 years to Negligible.

In terms of landscape character, Sheepwash is considered to have a Slight-Moderate Adverse significance of effect on the landscape improving with additional enhanced planting after a period of 10 years.

The landscape enhancements or mitigation for the Bockingfold proposal are unknown as a planning application has not yet been submitted.

Should both Sheepwash and Bockingfold be approved, there would be 4 solar energy farms located in an area of 6km. The initial combined effect of the solar energy farms over a distance of 6km is considered to be slight-moderate adverse. Over time as enhancements and vegetation establishes the effects would reduce to slight adverse.

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2 Noise

The Noise Impact Assessment used all the current standards and interpreted them as they should be. BS 4142:2014 is quite clear as stated in Section 11:

“Where background sound levels and rating levels are low, absolute levels might be as, or more, relevant than the margin by which the rating level exceeds the background. This is especially true at night.”

As a result an alternative NPSE assessment was undertaken.

NANR45 is usually reserved as a Local Authority guidance document for complaint work. It is not a British Standard. A fully revised Noise Impact Assessment for the site using BS 4142 and NANR45 can be undertaken. However, as the BESS has now been removed from the proposal it is not considered that this is warranted.

3 Glint and Glare

The middle of the solar panel has been used as the assessed height in metres above ground level (agl) as it represents the smallest possible variation in height from the bottom and top of the solar panels. It is also noted that the small variation in panel height will not change the conclusions of the report because the modelling results are unlikely to be meaningfully affected.

4 Construction Traffic Management

The CTMP and drawings have been revised and amended to take on board the consultation response from Kent County Council Highways.

On assessment the traffic route proposed by Marden Parish Council is not feasible for the reasons outlined at Appendix One.

5 Heritage

Whilst Maidstone Heritage and Design agrees with the Heritage Assessment consultation response focuses on the change in the rural setting without clear consideration on how this change actually affects the significance of the heritage assets (i.e. the distance and limited visibility). However, whilst the response concludes that this harm would be ‘minor and at the lower end of less than substantial’ this has been translated into an objection which is inconsistent.

In view of this response, the layout has been amended and the solar panels have been removed from an area to the north east of Little Cheveney Farm. It is therefore considered that given the degree of separation between the proposed solar energy farms and the heritage assets and the nature of existing and proposed screening, the proposal would not result in harm to the heritage assets or their setting. It should also be noted that paragraph 200 of the NPPF says that where a proposal would lead to less than substantial harm to the significance of a HA, this harm is to be weighed against the public benefits of the proposal. The proposal would result in less than substantial harm at the lower/lowest end of that spectrum to the heritage significance of the heritage assets and that harm would be temporary until the solar farm was decommissioned. The imperative to tackle climate change, as recognised in legislation and energy policy, and the very significant benefits of the scheme are therefore considered to outweigh the temporary and less than substantial harm to the heritage assets.

6 Site Security

In response to the comments by Kent Police the applicant has the following comments.

Police Comment	Response
1. The site should be fully enclosed within a minimum 2m security fencing system (or higher). We note the Perimeter Fence Details document states 2.4m, which is highly encouraged. It is, however, important that the gap between the base of any fencing and the ground is minimal, so that any equipment, such as the PV panels themselves or copper cable, cannot be easily passed underneath by thieves.	The gap at the base of the fence will be 100mm to allow small animals to access but will limit access from larger bodies.
Additional defensive planting of natural hedging (thorny hedging) should be also considered around the boundary, especially adjacent to the permissive footpath proposed, as an added layer of security. Digging deep ditches to control and deter unwanted vehicle access should be considered.	Thorny hedging to be considered in the LEMP as this can act as a deterrent The addition of deep ditches is a good approach during construction when materials are arriving to site when fencing has not been completed.
A single gated entrance and exit, removing all private access points that are not in use is recommended if possible, and an entry control system infrared, intercom or keypad should be installed.	The site will have CCTV and entry will be controlled from the remote security centre.
We note the Full Access Gate Elevation Plan. Secured by Design has a list of accredited products, which includes appropriate security standards for fences and gates, that have been tested and certified by a third party. This currently surpasses ADQ requirements.	Noted.
Hinge pins for equipment cabinets, associated buildings and gates should be hidden when closed and/or fitted with anti-lift devices.	This will be implemented for all site gates.
All photovoltaic (PV) solar panels should be individually security marked and all serial numbers recorded within a site inventory. We recommend that the PV's are installed using one way security clutch head security bolts/screws or similar, as an added layer of security and in order to make removal more difficult for thieves.	Each PV panel has a unique serial number laminated behind the front glass. From experience, security bolts do not prevent thieves stealing panels.
Copper cable, transformers, inverters, switch gear and any other equipment of high value should be security marked. This can be achieved by using unique identifiers, such as serial numbers on the insulation sheathing and / or with the use of forensic marking solutions. A full equipment inventory should be kept.	A full equipment inventory will be kept (including site spares) and include serial numbers for the main equipment. Transformers are enclosed within the MV station. String inverters are used which due to their weight (>80Kg) and distribution within the site are difficult to steal.
Appropriate crime prevention/security signage warning of the use of CCTV and forensic marking solutions should be installed on the exterior face of the security fencing and any gates.	Signage warning of CCTV cameras in use will be installed at regular intervals around the perimeter fence.
All inverter, substation, transformer, storage and control buildings/cabinets, including the monitoring cabin, should be fully alarmed with a monitored system and covered by CCTV. Appropriate security locks and devices should be installed on all equipment cabinets/ storage areas and associated buildings. Locking device screws/bolts should not be easily accessible when closed, to deter by-passing of the locks themselves by a determined offender. One way security clutch head security bolts/screws or similar can also be utilised to prevent easy removal.	CCTV design requirements cover 100% of the perimeter fence.
It is vital that appropriate security measures are installed, such as remotely monitored alarm systems and CCTV systems, that can report	CCTV will be installed with remote monitoring from a central control system.

activations to mobile devices or alarm receiving centres (ARC), for example. These devices can alert against unauthorised access to the site in general.	
Doorsets and gates/roller shutters should meet SBD Commercial standards and be certified, not just tested, by an independent third-party testing house.	Noted - Buildings with roller shutters are avoided where possible.
Windows and the glazing should meet SBD Commercial standards – glazing should be laminated rather than just toughened.	Noted. Buildings with windows are avoided where possible.
If approved, site security is required for the construction phase. There is a duty for the principal contractor “to take reasonable steps to prevent access by unauthorised persons to the construction site” under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.	Site security will be in place throughout the construction phase including temporary CCTV of all compound areas.
Our comments are designed to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our and Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.	Statkraft UK Limited will follow up with Kent Police on the security aspects of the design and operation.



Maidstone Borough Council
Maidstone House
King Street
Maidstone
ME15 6JQ

19 August 2022

To whom it may concern,

Our Ref: 21-0354

Re: Planning Application at Land North of Little Cheveney Farm, Sheephurst Lane, Marden, Kent (ref: 22/501335/FULL)

I am writing with regard to the planning application for the “*installation of a renewable energy led generating station comprising of ground-mounted solar arrays, associated electricity generation infrastructure and other ancillary equipment comprising of storage containers, access tracks, fencing, gates and CCTV together with the creation of woodland and biodiversity enhancements,*” at the above-mentioned site.

Rappor Consultants Ltd (formerly Cotswold Transport Planning Ltd) has been instructed to provide highways and transport planning consultancy advice in respect of the development and prepared the Construction Traffic Management Plan (CTMP) in support of the application. A highways consultation response has now been provided by Kent County Council (KCC), as local highway authority, who have raised a holding objection and this letter therefore sets out the responses to address their concerns.

To summarise, the following additional information has been requested by KCC:

1. Confirmation if the proposed temporary construction access will be retained in perpetuity and form the primary site access onto Sheephurst Lane;
2. An update site plan, preferably at scale 1:500, demonstrating the location of the site compound area;
3. Confirmation of the number of parking spaces that will be provided in the site compound area;
4. Amendments to the proposed route strategy so that all HGV's travel via the B2079, West End Goudhurst Road.

The CTMP has now been revised to address the four points above and is provided under separate cover.

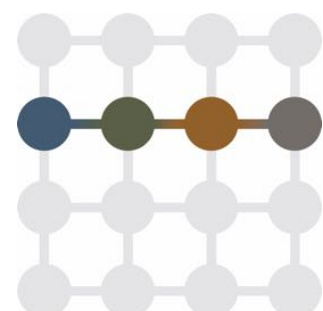
It is also noted that additional comments were received from Marden Parish Council (MPC), as statutory consultee, with regard to the proposed routing for construction traffic to / from the application site as follows:

“Cllrs wished to make comments relating specifically to traffic routing at Section 4 of the Construction Traffic Management Plan.

The proposed route takes the vehicles through the built-up centre of Marden and along narrow country lanes with single track in places and where there are very limited passing places.

Both Plain Road and Sheephurst Lane have single track bridges, and both are on the bus route.

Water and environmental • Landscape design
Transport planning • Civil engineering and infrastructure





Cllrs proposed that an alternative route is adopted which is half a mile shorter in length, has less bends, is double carriageway for its entire length and passes far fewer properties.

The suggested route proposed would from the A229 at Stilebridge onto the B2079, onto Underlyn Lane, Hunton Road, left at Green Lane, B2162 and into Sheephurst Lane at Claygate.

Hunton Road, Green Lane, B2162 and Sheephurst Lane are all within the 7.5 tonne weight limit but as the vehicles will be delivering in this zone it would be permissible to use this route."

KCC have provided comments on the routing for construction traffic and have suggested that all HGVs should travel via the B2079 and West End Goudhurst Road to gain access to Sheephurst Lane via the east. The amended CTMP has been updated to reflect this preferred route.

When considering the route proposed by MPC (A229 at Stilebridge onto the B2079, onto Underlyn Lane, Hunton Road, left at Green Lane, B2162 and into Sheephurst Lane at Claygate), it is noted that there are tight bends along the route with restricted forward visibility at these locations. A review of Google Maps suggests that the junction visibility splays where Green Lane meets the B2162 Collier Street is restricted to both the north and south.

In addition, and more notably, the junction visibility splays at Sheephurst Lane / B2162 Collier Street to the south are severely restricted in both directions. The B2162 is subject to a 50mph speed limit in this location meaning vehicle speeds will be higher than at the junction with Green Lane.

This could create potential conflicts at this junction for vehicles exiting the site, who would be required to turn right at this junction. This would be of particular concern for large, slow-moving HGVs. For the route suggested by MPC to provide a safe route for construction vehicles, it is considered that temporary traffic signals would be required at this junction. Given KCC has suggested an alternative route that would not require such traffic controls, this is considered preferable.

In light of the above, we consider the construction route proposed by KCC as being the most appropriate and suitable to serve the application site but would welcome additional commentary from KCC in this regard.

In conclusion, it is considered that the revised CTMP satisfactorily addresses the comments raised by KCC in their consultation response such that there are now no transport or highways reasons why the planning application cannot be approved. The alternative construction vehicle route suggested by MPC is not considered appropriate due to restricted visibility at key junctions.

Yours Sincerely,

Kevin Sykes

Associate Director

MEng, MCIHT