

New Ash Green Solar Scheme Planning Reference 24/03422/FUL

Updated Application (July 2025)

Have Your Say (Again): The Solar Farm – What’s Happened and What You Can Do Now

The developer **has resubmitted their application** — quietly hoping residents would lose interest. We haven’t.

We **stopped the BESS** because of the **community’s effort** and **excellent expert** advice. We must not stop now!

We now have until 17th Aug to submit additional comments to Sevenoaks District Council.

👉 **This presentation summarises EP’s responses** and why they still don’t stand up to scrutiny.

🔄 **Please review the slides and send in your Third objection** – even if you commented before, **you can** and we hope **you will, comment again**.

📢 **Let’s aim for even more than 1000 responses this time** to show how strongly we oppose this damaging proposal.



👥 **Anyone can comment** – you don’t need to live locally, and every person in a household can submit their own objection, regardless of age.

WHY ITS IMPERATIVE THAT YOU MUST ACT AGAIN

The first application was declared invalid **only because local residents and campaigners repeatedly highlighted flaws**. That the application is now live again — with only minor changes — demonstrates how little regard the applicant has for the unsuitability of the site.

The community cannot afford to relent. Every objection raised last time remains valid. However, the removal of the BESS addresses only one of many issues while simultaneously weakening the developer's justification for the scheme's benefits. The balance between harm and benefit — already unfavourable — has deteriorated

- ✓ Every objection raised last time still applies.
- ✓ Removing the BESS reduces one risk however weakens the benefits even further.
- ✓ The harm still far outweighs the benefit.

 You can find the original objection materials on our website:
 www.no-nags.co.uk (Public Documents > How to Object)

Don't be fooled The BESS will be back. If the solar farm is approved, the developer can submit a separate application for the battery later — and it will be much harder to stop once the principle of development is accepted.

The developer hopes residents will tire of fighting. We must demonstrate they are wrong.

Updated Application

The developer has resubmitted their application for a large-scale solar farm on land at New Ash Green & Ridley. The proposal remains fundamentally flawed, and inappropriate for this site.

The original application was invalidated after sustained effort from the local community and advice from our experts to expose its deficiencies — effort that **should have been unnecessary had the local planning authority exercised proper scrutiny**. Now resubmitted, the scheme remains **deeply damaging to the environment, local heritage, food security, biodiversity, public amenity and tranquillity**. Worse, the removal of the Battery Energy Storage System (BESS) — while reducing one safety risk — has also **undermined the already weak justification for the claimed benefits of the scheme**.

This document explains in detail why this application must still be refused



Why you should act again

The first application was declared **invalid only because local residents and campaigners repeatedly highlighted flaws** that were identified by our **diligent professionals**. That the application is now live again — with only minor changes — demonstrates how little regard the applicant has for the unsuitability of the site.

The **community cannot afford to relent**. Every objection raised last time remains valid. However, the removal of the **BESS addresses only one of many issues while simultaneously weakening the developer's justification for the scheme's benefits**. The balance between harm and benefit — already unfavourable — has worsened.

The **developer hopes residents will tire of fighting**. We must demonstrate they are wrong.



What's Changed?

The developer's headline change is the removal of the Battery Energy Storage System (BESS). This was the response to widespread public concerns about fire risk and the lack of sufficient regulation together with professional advice about the risk to our drinking water.

Don't be fooled – the BESS will be back. The developer has only removed the battery storage (BESS) to make this application more palatable. If planning permission for the solar farm is granted, they are very likely to submit a follow-up application to add the BESS later. At that point, it will be far harder to object, as the principle of development will already have been established. Granting this application paves the way for a future high-risk battery facility.



Why did the developer want a BESS and why does it matter?

A **Battery Energy Storage System (BESS)** is essentially a large on-site battery. On solar farms, it performs one crucial role: it allows energy generated during sunny, low-demand periods to be stored and then fed into the grid later — when demand is higher.

Put simply:

- ✅ Without a BESS, a solar farm **only delivers power when the sun shines**.
- ✅ With a BESS, the same power can be delivered when it's most needed — making it more valuable to the grid.

In planning terms, this is important because the applicant must demonstrate that the **public benefit of the proposal clearly outweighs its harms** (NPPF Green Belt policy). The claimed benefit is clean, secure energy supply — but **without a BESS, that supply is intermittent and mismatched to peak demand**.



Why Removing the BESS Weakens the Case for “Very Special Circumstances”

The applicant is proposing significant harm:

- Permanent industrialisation of Green Belt.
- Loss of high-grade farmland.
- Visual, noise and biodiversity harm.

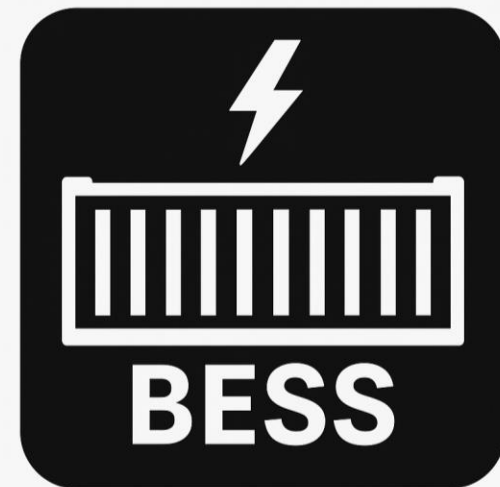
National policy allows this kind of “inappropriate” development **only if the public benefit clearly outweighs these harms.**

Without a BESS:

- The power output is reduced in *value*, even if the *volume* remains the same.
- Electricity is generated at times when it may not be needed and cannot be shifted to peak hours.
- Grid operators already curtail solar output at times of low demand (so-called “constraint payments”), meaning some of this energy may effectively be wasted.

In short:

- ✓ Without a BESS, this solar farm’s contribution to energy security is lower — while the harms remain the same.
- ✓ This tips the planning balance further against approval.



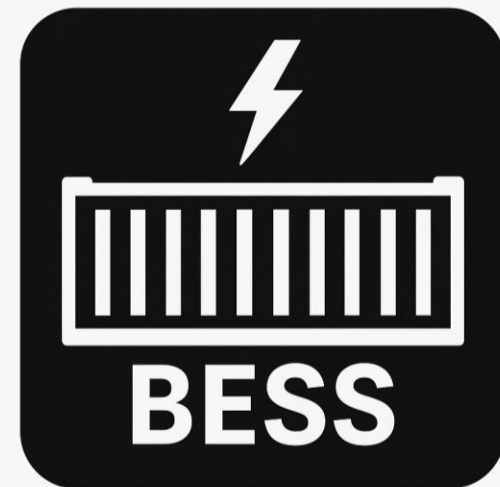
Why Removing the BESS Weakens the Case for “Very Special Circumstances” cont..

Conclusion:

The removal of the BESS leaves the scheme with no means to store generated electricity, making it fully dependent on sunshine and unable to deliver electricity at peak demand when it is most needed.

Other changes are minor and cosmetic — minor layout adjustments, tweaks to the access track design — none of which address the fundamental unsuitability of the site.

**In short: Same Site. Same harm. Same
flawed justification.**

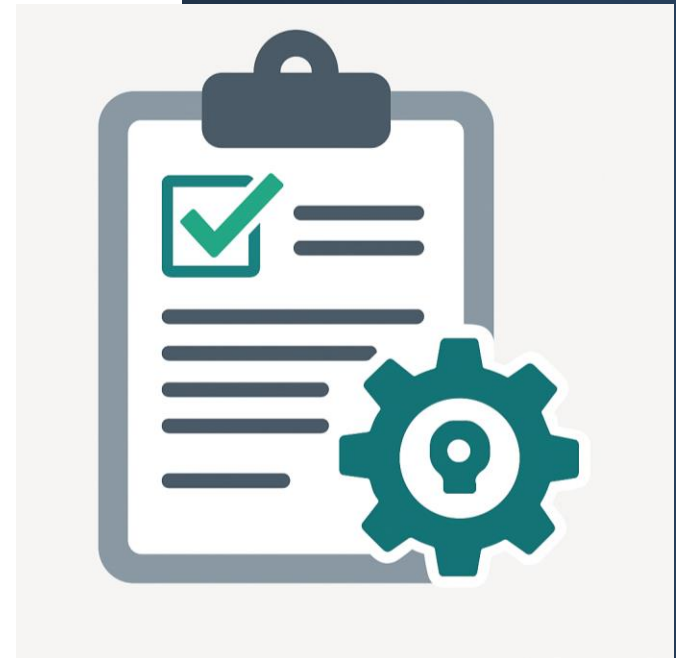


Key Reasons to Object – At a Glance

This application is fundamentally unacceptable because:

- It causes clear and substantial harm to the Green Belt.
- It sacrifices award-winning, high-quality farmland, undermining UK food security.
- It damages valued landscapes, views, heritage and public enjoyment of the countryside.
- It fragments wildlife habitats and threatens protected species.
- It continues to put drinking water aquifers at risk of contamination.
- It imposes noise, construction traffic, and disruption to local residents.
- It fences in footpaths and ruins people's experience of the countryside

These harms are not outweighed by the benefits, particularly now that the battery storage (BESS) has been removed.



Planning Balance – Harm > Benefit

The BESS was removed in response to **justified public concern over the safety risk**. The BESS was a health and safety threat. However, its removal significantly **weakens the claimed benefits of the scheme**, which was partly justified as contributing to energy storage and grid stability.

Now, electricity can **only be exported when the sun is shining** — which is not aligned with demand peaks — **undermining claims of reliability or strategic value**. At the same time, **fire risks remain**, as solar panels, transformers and inverters are all prone to overheating and failure.

Very little electricity will be sent to the National Grid on dark winter days, exactly the time when the demand is high

In no sense does this **justify covering 235 acres of Green Belt** and productive farmland **with glass, steel and security fencing**.

As the **House of Commons Select Committee warned, 7 July 2025**: **solar development must avoid high-quality farmland and inappropriate sites**.



Why this Breaks the Green Belt Rules

- This land is officially **Green Belt** in the council's Local Plan, so strict rules apply.
- We have always known this land to green belt, as confirmed by a number of our experts.
- The **developer is claiming** that this land should **no longer be Green Belt** and suggesting it is in fact Grey Belt.
- They wish to see the Green Belt protections extinguished. We are disputing this on behalf of the local community through professional advices.



Green Belt – Still Inappropriate

The site lies within the London Metropolitan **Green Belt**.

The National Planning Policy Framework (NPPF) makes it clear that **development in the Green Belt is inappropriate unless “very special circumstances” exist.**

Those circumstances must **clearly outweigh the harm to the Green Belt and any other harm.**

Industrialising it is **inappropriate and unnecessary.**



Loss of Productive Farmland – Food Security Matters

More than half of the site consists of **Grade 2** and **Grade 3a “best and most versatile”** farmland — among the most productive agricultural land in the UK. The remainder is **active, well-managed grazing land**, currently supporting the **award-winning Ayrshire herd of the Howie family**. This herd won Supreme Interbreed Champion at the South of England Show in June 2025 — a testament to the quality of the land and its management.

Once soil is compacted under solar panels and subjected to decades of degradation, it is unlikely to fully recover. The **House of Commons debate (15th May 2025)** highlighted the threat to food security posed by **inappropriate siting of solar farms on productive farmland** — urging planners to avoid such harm where alternative, less valuable land is available*.

This land is too valuable to lose.



How the Quality of the Farmland has been misrepresented

The Developer wants to downplay the value of the land they plan to cover with solar panels. Here's how they've done it — and why the truth is far more serious.

Developers Claim:

They say that 55.5 hectares of the 105.8-hectare site is “Best and Most Versatile” (BMV) farmland — around **53%** of the total area. But that's misleading.

The Problem:

The full site includes **19.9 hectares of ancient woodland and other land that can't be farmed** — but the developer still includes this in the total when calculating the percentage.

The Corrected Figure (even using EP's own data):

Once you remove the woodland from the calculation (see following slide for details), you're left with around **85.9 hectares** of actual farmland. That makes the BMV portion around **65%** — not 53%!

Our Expert Assessment :

We commissioned a proper soil expert to review this. Their analysis found that the land is even better than the developer admits:

Much of it is actually **Grade 2 (very good)**.

Some patches are even **Grade 1 — the highest classification**.

The developer downgraded some areas to “Grade 3b” based solely on steepness of slope — **not soil quality**.

Once you adjust for that and remove the woodland, our expert concludes that **closer to 90% of the site is high-quality, productive farmland**.



BMV Land calculations

Land Classification	EP's Distorted Calculation	Corrected Calculation (Excludes Non-Ag Land)
Grade 2 (Very good quality)	~34% (36.1ha)	~43% (36.1ha ÷ 84.2ha)
Subgrade 3a (Good quality)	~19% (19.4ha)	~23% (19.4ha ÷ 84.2ha)
Subgrade 3b (Moderate quality)	~28% (29.4ha)	~35% (29.4ha ÷ 84.2ha)
Non-agricultural (woodland, etc.)	~19% (19.9ha)	0% (excluded from calculation)
BMV (Grades 2 + 3a)	~53% (55.5ha)	~65% (55.5ha ÷ 84.2ha)



Landscape and Visual Harm

- The Developers own viewpoint visualisations confirm that the proposed development **will result in significant adverse visual impacts**, particularly from public footpaths and nearby residential properties.
- **Even after 10 years, mitigation planting does not fully screen** the industrial character of the site, and in winter, impacts are likely to be worse.
- This level of harm conflicts with NPPF and local policy, which **seek to protect the intrinsic character and beauty of the countryside** and to minimise the impact of renewable energy projects on landscape and visual amenity.
- The developer's own assessments confirm that the proposed development **will result in moderate adverse harm to the Ash-Cum-Ridley Settled Downs character area and significantly reduce the tranquillity and openness of this highly valued rural landscape.**
- Public rights of way will become more enclosed, diminishing recreational and amenity value.
- Reliance on mitigation planting **assumes optimal growth** and maintenance over decades, which **cannot be guaranteed**. The industrial character and spatial harm introduced by the scheme outweigh its claimed benefits



Landscape and Visual Harm

The site is **highly visible**, especially because of its **hilly, sloping topography**.

Panels up to **3 metres high**, **fencing at 2.2 metres**, and **CCTV poles up to 5 metres** will **dominate views** from New Ash Green, Ridley, Hartley, and along several well-used public rights of way.

The view from Ridley and New Ash Green will be of the **metal framework** and the **backs of the solar panels**. The panels must face south and the major views are from the East, the West and the North

The Developer has not demonstrated how **privacy concerns for adjacent land users and rights of way** will be effectively safeguarded.

The developer suggests hedges will screen the site — but this is **wholly inadequate for such industrial-scale infrastructure**.

Walkers on footpaths will find themselves **funnelled between security fences, deprived of the open countryside** experience they value.



Landscape and Visual Harm

The updated LVIA underestimates harm by focusing on summer views and ignoring significant winter visibility when planting provides little screening.

The limited Photomontages are selective, relying on best-case conditions and failing to show true long-range and elevated viewpoints.

The updated Glint & Glare assessment confirms that residual adverse **impacts on residential receptors remain even after mitigation.**

Mitigation planting proposed is slow-growing and would take years to establish, during which openness is irreversibly harmed.

The developers reliance on a dated (2009) manufacturer's technical note to demonstrate low reflectivity of solar modules is insufficient to fully address localised glint and glare impacts identified in the updated assessment.

Temporary or partial screening does not offset the permanent loss of Green Belt openness — a point upheld in several appeal decisions.

Local Plan policy and NPPF require protection of openness, not just visual screening; harm remains even if views are partly softened.



Landscape and Visual Harm – Where's the truth

No accurate visual mock-ups have been provided to show residents—or the Planning Committee—what this industrial-scale solar farm will *actually* look like.

- No photomontages from the worst-affected homes.
- No views from upper floors, only ground level.
- No accurate depiction of *real* fencing or CCTV poles—only misleading sketches with wooden fences.
- No proper wireframes showing how the scheme sits on sloping land or how orientation increases visual impact.

How can the visual harm be properly assessed without this?

The piecemeal images provided are not just incomplete—they are *actively misleading*.



Heritage & Rural Character

The scheme **destroys historic field patterns**, confirmed by our expert to be **over 600 years old**, harms the setting of nearby listed buildings, and **destroys the tranquillity and rural character** of the area.

Such effects are contrary to policies protecting landscape and heritage.



Wildlife Harm & Ancient Woodland

The development **breaches recommended buffer zones for ancient woodland and veteran trees.**

Security fencing **cuts wildlife corridors**, trapping and isolating animals.

The scheme also risks **fragmenting ancient woodland habitats**, which reduces resilience and species diversity, contrary to Natural England's standing advice on ancient woodland.

The scheme prioritises mitigation over avoidance, which is contrary to national and local policy

The developer's claimed "biodiversity net gain" is theoretical — **dependent on planting that will take decades to mature.**



Biodiversity Net Gains (BNG)

- The development fails to demonstrate sustainable, meaningful biodiversity improvements.
- The **claimed gains rely heavily on grassland enhancement beneath solar panels**, where **ecological condition is likely to decline**. Furthermore, the development continues to place pressure on **irreplaceable ancient woodland** and its buffer zones, contrary to NPPF and standing advice.
- The long-term deliverability of habitat enhancements is also questionable given the **limited detail on enforceable management plans**.



BNG - Great Crested Newts

The developers use of District Level Licensing for great crested newts **acknowledges unavoidable harm** to GCN habitat on site.

While the DLL process ensures lawful compliance and financial compensation, it **does not eliminate the on-site loss of habitat or disturbance**.

Furthermore, the **reliance on off-site compensation** runs counter to the NPPF's **preference for on-site biodiversity enhancement** wherever possible.

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



Flood Risk & Aquifers

- The site is officially in Flood Zone 1, but parts of it still flood with **up to 60cm of water during heavy rain**, which the developer downplays.
- Their plan to slightly raise the panels and add some drains **Will not solve the problem** of water running off, soil being washed away, or flooding nearby land.
- The site sits on top of a **sensitive chalk aquifer**, which supplies drinking water. Their drainage plans risk **polluting the groundwater**, which could affect water quality locally.
- The developer admit the details of the drainage system will be worked out later — but **we can't judge if it will really work at this stage**, and permission shouldn't be given without a proper, detailed drainage plan.
- The scheme ignores the **cumulative impact** of water damage over time — both on the site and on surrounding land and homes.
- This goes against planning rules that require protecting the countryside from flooding and keeping groundwater safe.



Noise

SMA inverters and transformers produce a **constant low-frequency hum**, audible in the still countryside air.

The valley naturally **carries and echoes sound**, so even moderate noise stands out more here than in flatter, built-up areas. Saying noise impact is “low” ignores how that level in this quiet valley feels intrusive — especially when echo amplifies it.

The suggested acoustic fence is **only a concept**, with no real proof it would actually reduce the sound in our setting.



Traffic & Public Rights of Way

Construction will take around **nine months**, with over **2,500 HGV movements on narrow**, unlit rural lanes.

These lanes are not designed for such traffic and **pose a risk to walkers, cyclists, and horse riders.**

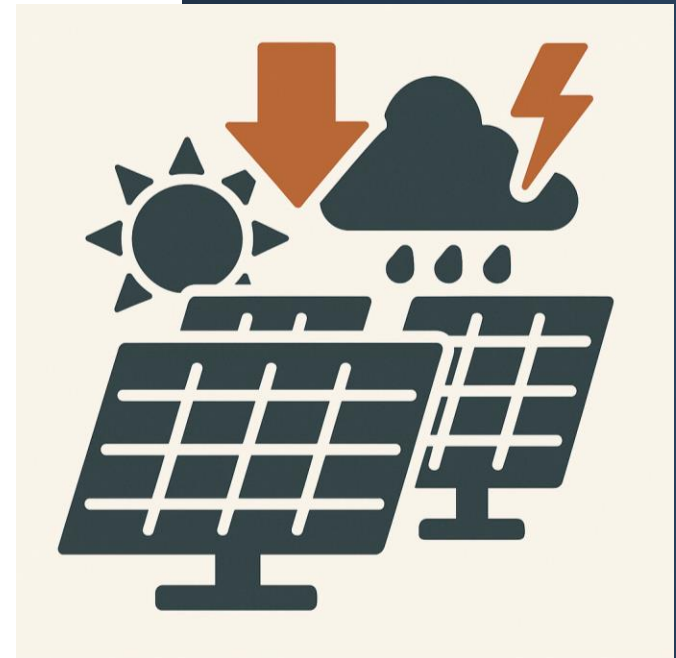
Public footpaths will become **uninviting, hemmed in by fences and surveillance cameras**, with walkers also subjected to the **constant hum of inverters** carrying across the quiet countryside.

The development **still fails to enhance or protect the experience of walkers, cyclists, and equestrians** using the extensive local public rights of way network. The industrialisation of open fields will erode the rural character of these routes, discouraging their use



Solar Panels _ Elevation Drawings

- The developer still **fails to include basic elevation drawings** or site sections, which are required under Sevenoaks' own validation checklist for a full planning application.
- These are essential to understand how the solar panels will be arranged across a steeply sloping site.
- Instead, the only panel detail **submitted assumes flat ground**, which is entirely misleading.
- Without accurate visuals, the **planning committee and the public cannot meaningfully assess landscape harm**, design appropriateness, or visual intrusion.
- This omission raises serious concerns about whether the application should have been validated in the first place



Panel Manufacturing & Recycling – The Myths

- The developer specifies panels from “Canadian Solar,” which are in fact **largely manufactured in CHINA** — a supply chain scrutinised for forced labour risks. **The “Canadian” branding is MISLEADING**, and the developer has deliberately chosen this supplier to make the panels appear more trustworthy and Western-made.
- Globally, less than 10% of solar panels are ever recycled, and **no firm commitment** has been made here to recycle panels, inverters, cabling, or fencing.
- Claims of “full recyclability” are **marketing, not reality**.



Site Selection

- The developer fails to demonstrate that **alternative sites outside the Green Belt** or of lower agricultural quality were properly assessed, either within Sevenoaks or nearby districts.
- The developer **incorrectly assumes all need must be met within the district**, contrary to the strategic, cross-boundary nature of renewable energy planning.
- The Developer also fails to demonstrate that alternative options—such as smaller, distributed schemes—have been properly considered. As a result, the site selection exercise **does not justify the ‘very special circumstances’ needed to outweigh the substantial harm to the Green Belt.**



The Fairness of the Process

Residents and experts acting on behalf of the community flagged flaws in the original application **months before SDC acted** — highlighting failures the authority should have caught itself.

This has imposed **unnecessary cost, stress, and frustration on the community**. Even now, the revised application **does not address the core problems**.

It is **unacceptable** that the burden of scrutiny **falls disproportionately on residents** while the developer benefits from deep pockets and time.



Even the Government Agrees

Ed Miliband MP, **Secretary of State for Energy Security** and Net Zero, stated in the Solar Roadmap (30th June 2025):

<https://www.gov.uk/government/publications/solar-roadmap/solar-roadmap-united-kingdom-powered-by-solar-accessible-webpage>

*“We will always prioritise brownfield, industrial and low-grade agricultural land over high-quality farmland. Our **commitment to food security and protecting our countryside** remains a central part of our strategy.”*

This proposal does the opposite.



Strong Local Opposition

The petition currently stands at **3,214** signatures

<https://www.change.org/p/no-new-ash-green-solar-nonags>

- The developer consultation process fell short of providing meaningful engagement, as required by the NPPF and Sevenoaks' Statement of Community Involvement.
- Feedback indicated significant community opposition to the principle of development on this Green Belt and agricultural site.
- The developer's minor design changes fail to meaningfully address any of the core concerns — including harm to the Green Belt, loss of productive farmland, severe landscape and visual impact, damage to ancient woodland, trees and wildlife, flood risk and groundwater contamination, unsuitable rural roads, loss of public amenity, harm to well-used footpaths, and the complete lack of local benefit
- Sets dangerous precedent for more Green Belt loss




CALL TO ACTION:

The developer has resubmitted their application — quietly hoping residents would lose interest. We haven't

 **Submit Your Objection Now** 

 Email **planning.comments@sevenoaks.gov.uk**

 Submit online: **<https://pa.sevenoaks.gov.uk/>**

 **Deadline: 17th Aug 2025**

Please keep a copy of all objection letters, they may be needed in the future

Same site. Same harm. Same flawed justification.

Original How to Object guide

The original “How to object guide” can be found at:

<https://www.no-nags.co.uk/public-files>