

Statement of Land north of Little Cheveney Farm, Sheephurst Lane, Marden, Kent
List of Appellant's Supporting Documents

1 Application and Related Documents	
APP1.1	Completed Application Form dated 20 May 2022
APP1.2	Amended Completed Application Form dated 20 May 2022
APP1.3	Drawings submitted with the application, comprising:
APP1.3.1	27899/053 Rev A - Proposed Solar Farm Footpath and Boundary Layout
APP1.3.2	27899/061 Rev A - Proposed Site Overview Plan Sheet 2 of 5
APP1.3.3	27899/063 Rev B - Proposed Site Overview Plan Sheet 4 of 5
APP1.3.4	27899/105 Rev A - PV Structure Framework
APP1.3.5	27899/150 Rev C - Site Location Plan
APP1.3.6	27899/051 Rev A - Aerial Site Location Plan
APP1.3.7	27899/011 Rev A - Timber Fence Elevations
APP1.3.8	21-0354 SP02-A - CTMP Plan Swept Path Analysis
APP1.3.9	21-0354 SP01-B - CTMP Plan Swept Path Analysis Primary Site Access
APP1.3.10	21-0354 SK03-A - CTMP Plan Construction Traffic Routing
APP1.3.11	21-0354 SK04 - CTMP Plan Proposed Site Compound
APP1.3.12	GGO-JBAU-XX-XX-DR-D-0001 Rev P02 - Surface Water Drainage Strategy DNO/Customer HV Compound
APP1.3.13	SKUKX-SHEEP-000-MCS 206 - CCTV Elevation
APP1.3.14	SKUKX-SHEEP-001-HVG 465 - Main Building Plant (HV Compound)
APP1.3.15	SKUKX-SHEEP-001-HVG 466 - Main Building Elevation (HV Compound)
APP1.3.16	SKUKX-SHEEP-000-HVG 104 - Monitoring Cabin
APP1.3.17	SKUKX-SHEEP-000-MCS 201 - Internal Tracks
APP1.3.18	SKUKX-SHEEP-000-MCS 203 - Perimeter Fence Detail
APP1.3.19	SKUKX-SHEEP-000-MCS 204 - Gate Elevation
APP1.3.20	SKUKX-SHEEP-000-MCS 205 - Solar Framework Elevation
APP1.3.21	SKUKX-SHEEP-000-MCS 252 - Transformation Station
APP1.3.22	SKUKX-SHEEP-000-MCS 253 - Edge of Park Switchgear Station
APP1.4	Heritage Desk Based Assessment dated January 2022

APP1.5	Solar Photovoltaic Glint and Glare dated January 2022
APP1.6	Grid Connection Assessment dated February 2022
APP1.7	Construction Method and Decommissioning Statement dated March 2022
APP1.8	Statement of Community Involvement dated March 2022
APP1.9	Sequential Analysis Study dated February 2022
APP1.10	Landscape and Visual Impact Assessment dated February 2022
APP1.11	Technical Note - Public Rights of Way Mitigation Strategy dated February 2022
APP1.12	Ecological Impact Assessment dated February 2022
APP1.13	Biodiversity Net Gain Report dated February 2022
APP1.14	Outline Surface Water Drainage Strategy dated February 2022
APP1.15	Construction Traffic Management Plan dated February 2022
APP1.16	Flood Risk Assessment dated March 2022
APP1.17	Noise Impact Assessment dated March 2022
APP1.18	Landscape and Ecological Management Plan with Biodiversity Net Gain Management and Monitoring Plan dated March 2022
APP1.19	Planning, Design and Access Statement dated March 2022
APP1.20	Agricultural Land Use Statement dated March 2022
APP1.21	Agricultural Land Classification and Soil Resources dated March 2022
APP1.22	Request for a Screening Opinion
APP1.23	Screening Request (reference 21/503277/ENVSCR) Screening Matrix
APP1.24	Screening Opinion Decision (reference 21/503277/ENVSCR) issued 5 July 2022
APP1.25	Letter from JBA Consulting to the Appellant dated 23 August 2022 attaching drawing no. IRA-JBAU-XX-XX-SK-C-0001 in response to the Environment Agency's consultation response
APP1.26	Letter from the Appellant to the Council dated 31 August 2022 [incorrectly dated 31 August 2021] amending the appeal and attaching new documents:
APP1.26.1	Drawing 27899-SK01 Rev A - Proposed Solar Farm Site Areas
APP1.26.2	Drawing 27899/050 Rev E - Proposed Solar Farm Site Layout Plan
APP1.26.3	Drawing 27899/060 Rev B - Proposed Site Overview Plan Sheet 1 of 5
APP1.26.4	Drawing 27899/064 Rev C - Proposed Site Overview Plan Sheet 5 of 5
APP1.26.5	Drawing 27899/062 Rev B - Proposed Site Overview Plan Sheet 3 of 5

APP1.26.6	Drawing AW0143-PL-0002 - Proposed Mitigation, Landscape and Ecology Enhancements
APP1.26.7	Response to Comments and Objections dated August 2022
APP1.26.8	Utility Scale Solar Background Briefing dated August 2022
APP1.26.9	Detailed Response on Key Issues: Landscape, Noise, Glint and Glare, Construction Traffic Management, Heritage and Site Security dated August 2022
APP1.27	Letter to the Council dated 1 September 2022 attaching the revised Construction Traffic Management Plan dated August 2022
APP1.28	Planning Committee Report dated 20 October 2022
APP1.29	Update to the Planning Committee Report dated 20 October 2022
APP1.30	Decision Notice dated 28 October 2022 for planning application 22/501335/FULL
APP1.31	Minutes of the Planning Committee dated 20 October 2022
APP1.32	Documents submitted regarding the Proposed Development:
APP1.32.1	Grid Review Planning Report dated March 2023
APP1.32.2	Agricultural Appeal Statement dated April 2023
APP1.32.3	Ecological Response dated 19 April 2023
APP1.32.4	Updated Sequential Analysis Study dated 24 April 2023
APP1.32.5	Landscape Response to Appeal Scheme dated April 2023
APP1.32.6	Heritage Appeal Statement dated April 2023
APP1.32.7	Supplementary Noise Impact Assessment dated April 2023
APP1.33	Documents submitted regarding Appeal Amendments:
APP1.33.1	Appeal Amendments Summary dated April 2023, together with Drawing SCUXX-SHEEP-000-100P PV Layout Amendments
APP1.33.2	Biodiversity Net Gain Assessment dated April 2023
APP1.33.3	Ecological Impact Assessment dated April 2023
APP1.33.4	Landscape and Visual Impact Addendum dated April 2023
APP1.33.5	Carbon Emissions Statement dated April 2023
APP1.33.6	Supplementary Noise Impact Assessment dated April 2023
APP1.33.7	Outline Surface Water Drainage Strategy dated April 2023
APP1.34	Drawings submitted with the Appeal, comprising:
APP1.34.1	Drawing SCUXX-SHEEP-000-100P PV Layout Overview Plan

APP1.34.2	Drawing AW0143-PL-0002 Rev A Proposed Mitigation, Landscape and Ecology Enhancements – Appeal Site
2 Consultation Responses	
APP2.1	Consultation Responses to Application Documentation, comprising APP2.1.1 to APP2.1.33:
APP2.1.1	Collier Street Parish Council
APP2.1.2	CPRE (28 June 2022)
APP2.1.3	Environment Agency (28 June 2022)
APP2.1.4	Environment Agency (22 September 2022)
APP2.1.5	High Weald AONB Unit (21 September 2022)
APP2.1.6	Historic England (17 June 2022)
APP2.1.7	Historic England (8 September 2022)
APP2.1.8	Kent County Council – Archaeology (10 August 2022)
APP2.1.9	Kent County Council – Ecological Advice (6 September 2022)
APP2.1.10	Kent County Council – Flood and Water Management (1 July 2022)
APP2.1.11	Kent County Council – Flood and Water Management (23 September 2022)
APP2.1.12	Kent County Council – Highways (11 July 2022)
APP2.1.13	Kent County Council – Highways (30 September 2022)
APP2.1.14	Kent County Council – Minerals and Waste (13 June 2022)
APP2.1.15	Kent County Council – Public Rights of Way and Access (14 June 2022)
APP2.1.16	Kent County Council – Public Rights of Way and Access (8 September 2022)
APP2.1.17	Kent Police (23 June 2022)
APP2.1.18	Kent Police (20 September 2022)
APP2.1.19	Maidstone Borough Council – Heritage and Design (10 August 2022)
APP2.1.20	Maidstone Borough Council – Heritage and Design (11 October 2022)
APP2.1.21	Marden Parish Council
APP2.1.22	Marden Parish Council (8 August 2022)
APP2.1.23	Maidstone Borough Council – Environmental Protection (1 July 2022)
APP2.1.24	Maidstone Borough Council – Environmental Protection (5 October 2022)
APP2.1.25	Natural England (20 July 2022)

APP2.1.26	Natural England (22 September 2022)
APP2.1.27	Network Rail (7 September 2022)
APP2.1.28	Network Rail (10 October 2022)
APP2.1.29	Southern Water (1 July 2022)
APP2.1.30	Southern Water (26 September 2022)
APP2.1.31	Upper Medway Internal Drainage Board (5 July 2022)
APP2.1.32	Upper Medway Internal Drainage Board (21 September 2022)
APP2.1.33	Weald of Kent Protection Society (4 July 2022)
APP2.2	Third Party Representations (81 objections)
3 The Development Plan, National Policy and Other Material Considerations	
APP3.1	Maidstone Borough Local Plan (adopted October 2017)
APP3.2	Maidstone Borough Council Local Plan Review (October 2021)
APP3.3	National Planning Policy Framework (updated 20 July 2021)
APP3.4	National Planning Practice Guidance (online resource) http://planningguidance.planningportal.gov.uk/
APP3.5	Maidstone Borough Council Biodiversity Climate Change Strategy (October 2020)
APP3.6	Ten Point Plan for a Green Industrial Revolution (November 2020)
APP3.7	UK Energy White Paper: Powering our Net Zero Future (December 2020)
APP3.8	Net Zero Strategy: Build Back Greener (October 2021)
APP3.9	British Energy Security Strategy (April 2022)
APP3.10	Powering Up Britain (March 2023)
APP3.11	Procedural Guide: Planning appeals – England, updated 21 December 2022 (online resource) Procedural Guide: Planning appeals – England - GOV.UK (www.gov.uk)
APP3.12	Overarching National Policy Statement for Energy (EN-1) 2021
APP3.13	National Policy Statement for Renewable Energy Infrastructure (EN-3) 2021
APP3.14	Draft Overarching National Policy Statement for Energy (EN-1) 2023
APP3.15	Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) 2023
4 Ecology	
APP4.1	British Standard BS 5837 (2012) – Trees in relation to Design, Demolition and Construction
5 Planning Appeal Decisions and Court Judgments	

APP5.1	Appeal decision for land near to Bishop's Itchington, Stratford on Avon, Warwickshire dated 1 December 2022 (APP/J3720/W/22/3292579)
APP5.2	Appeal decision for land at Rawfield Lane, Fairburn, Selby dated 1 December 2022 (APP/N2739/W/22/3300623)
APP5.3	Appeal decision for land east of Mursley Road, Little Horwood, Buckinghamshire dated 2 December 2022 (APP/J0405/W/22/3302716)
APP5.4	Appeal decision for land east and west of A130 and north & south of Canon Barns Road, East Hanningfield, Chelmsford, Essex dated 6 February 2023 (APP/W1525/W/22/3300222)
APP5.5	Appeal decision for Michens Lane, Bramley, Hampshire dated 13 February 2023 (APP/H1705/W/22/3304561)
APP5.6	Appeal decision for land west of New Works Lane, Telford, Shropshire dated 27 March 2023 (APP/C3240/W/22/3293667)
APP5.7	Appeal decision for Great Pagehurst Farm, Staplehurst dated 10 April 2017 (APP/U2235/W/16/314969)
APP5.8	R Corbett v Cornwall Council [2020] EWCA Civ 508 [para 45]
APP5.9	TW Logistics Limited v Tendering DC [2013] EWCA Civ 9 [para 18]
APP5.10	Bernard Wheatcroft Limited v Secretary of State for the Environment [1981] 1 EGLR 139
6 Legislation	
APP6.1	Climate Change Act 2008 (2050 Target Amendment) Order 2019
APP6.2	Town and Country Planning (Appeals) (Written Representations Procedure) (England) Regulations 2009