14. Response to Public Comments

14.1. Over the course of the application process and at the time of writing, the application has received 106 public comments of which 3 stated support and 103 raised objections.

14.2. Appendix 10 provides a breakdown of the key topic areas raised and the responses to each point. Where necessary information has been signposted to the original submission and relevant sections of this Planning Addendum.

Appendix 10

Total number of public comments: 106 (up to and including 01/3/24)

- Support: 3
- Objections: 103

Topic/Comment	No. of people making comment	% of the 103 objections making comment	How this has been addressed	Where to find more information
Support				
General support for the proposal	3	N/A	Comments welcomed and noted.	N/A
Need for renewable energy	3			
The project would have positive impact on the environment	2			
Reduces use of fossil fuels	3			
Increases biodiversity	1			
Continued agricultural use	1			
Would improve the arable land	1			
Visual / landscape impact				
Negative visual / landscape impact / impact on character of the countryside	64	62%	The Applicant worked hard to choose a location and a design which will keep the landscape and visual impact of the Proposed Development to a minimum. A Landscape and Visual Appraisal has been included with the planning application, which ensures any potential impact on the landscape has been appropriately assessed and mitigated. The site is not located within any nationally designated landscapes and potential visibility of the Proposed Development would be largely limited by the existing surrounding woodland, hedgerows and the M20 motorway. There are a small number of residential properties in the vicinity of the site. New native woodland buffer, new	Landscape and Visual Assessment Landscape Masterplan Planning Addendum Section 5 N/A
Mitigation planting would be ineffective / take a long time to establish	5	5%		

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			hedgerows and/or infill planting will be undertaken, where required. As well as minimising potential visibility, the planting will provide a plentiful source of food and shelter for a range of fauna. Following the public consultation in July 2023, the Applicant has also made changes to inverter and storage locations to benefit from existing mature native hedgerows so that screening will take effect immediately.	
Photomontages inaccurate / misleading	5	4%	A number of photomontages demonstrating the visual effect of the solar farm have been submitted with the planning application, along with a Landscape and Visual Appraisal. These have been produced in accordance with best practice guidance under the third edition of the Guidelines for Landscape and Visual Assessment (GLVIA3).	
No photomontages from Saxon Place or Mussenden Farm	3	3%	The viewpoint locations were agreed in consultation with Sevenoaks District Council to provide a representative view of the Proposed Development from all areas. Viewpoints 5, 6 and 7 are representative of views towards the site from residents at Saxon Place and Mussenden Lane. As per the Landscape Masterplan, the following offsets have been applied from properties on the south eastern boundary of Saxon Place: • Minimum of 400m between the properties and Field F3C; and • Minimum of 200m between the properties and Field F3B. As part of the Planning Addendum, additional photography is provided of views from designated heritage assets on	

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			Mussenden Lane demonstrating the offsets applied to the design of Chimmens Solar Farm: • Due south from Mussenden Farm / Oast House = circa 315m to redline boundary (with 5m native woodland planting with fence line and internal track circa 5m beyond); and • Due southeast along Mussenden Lane from Oast House = circa 238m (with 5m native woodland planting with fence line and internal track circa 5m beyond).	
Limited visual impact – the project is well screened	1	N/A	Comment welcomed and noted.	
Scale				
Too large	2	2%	The Planning Addendum provides further clarification on the planning application boundary (244 acres) and the buildable solar PV area (167 acres) which aligns with national renewable energy guidance and solar schemes already consented in the area. Unlike older solar farms which benefitted from subsidies, solar farms now need to be larger in order to drive the cost efficiencies needed to keep the cost of electricity low and to meet the government's net zero and energy security ambitions.	Planning Addendum Section 13
Development in the Green Belt / AONB				
Development in the Green Belt / no special circumstance demonstrated	58	56%	The proposed Chimmens Solar Farm planning application is supported by a Site Alternatives Study which identifies that a significant amount of land with Sevenoaks District Council (SDC) is Greenbelt and therefore unavoidable when finding suitable sites to host ground mounted solar development.	Landscape and Visual Assessment Site Alternatives Study Planning Statement
Impact on AONB and conservation area	4	4%		

Topic/Comment	No. of people making comment	% of the 103 objections making comment	How this has been addressed	Where to find more information
			The Proposed Development has been designed to integrate into the surrounding area as appropriately as possible. Due to the temporary nature of the Proposed Development, there will not be a long-term loss of greenbelt and the land can be returned to agricultural practices at the end of the solar project. There are strong local and national policies demonstrating the need for renewable energy projects in order to tackle climate change and meet the government's targets for net zero carbon emissions by 2050. The Proposed Development aligns with these policies and the benefits of the renewable energy generated by the project would be realised locally and nationally. The Planning Statement, landscape and visual assessment and the planning addendum set out the very special circumstances. Whilst it is accepted that there will be an inevitable temporary change of land use within the Green Belt to facilitate this development, and thus a reduction in the openness, the LVIA submitted with the development outlines that the visual impacts of this are likely to be localised and limited in nature. Furthermore, the development is temporary in its nature and reversible following its operational lifetime of 40 years. It is therefore considered that the very special circumstance presented by the means of renewable energy generation and the benefits associated with the scheme outweigh the limited impact to the openness of the Green Belt in line with the NPPF.	Planning Addendum Section 5 and 13
Loss of agricultural land				
Loss of agricultural land / food production	55	53%	The Proposed Development would not pose a threat to food security. One of the biggest risks to food security is the changing climate. In 2023, we saw further effects of climate	Agricultural Impact Assessment

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			change. The UK's hottest June on record caused unprecedented deaths of fish in rivers and disturbed insects and plants, and the world's average temperature reached a new high for the third time in a week. The Proposed Development will help towards tackling climate change by offsetting over 1.2million tonnes of carbon dioxide (CO2).Furthermore, is specifically designed to be dual purpose, enabling continued agricultural use, in the form of sheep grazing, and renewable generation. Agricultural land covers between 56% and 70% of UK land. Solar farms in the UK currently[1] have a combined capacity of around 15GW which makes up just under 0.1% of land in the UK. By comparison, the total land used by the UK's golf courses is 0.5% and airports is 0.2%. The UK Energy Security Strategy commits to increase the UK's current 14GW of solar capacity by up to 5 times by 2035. If the government meets its target of increasing solar capacity fivefold, ground-mounted solar would cover a total of around just 0.3% of the UK's land surface which is still less than the total land used by the UK's golf courses. Sheep farming provides employment, supports rural economies and can produce a much more diverse ecological mosaic across the site. Landscapes managed by grazing sheep support a rich diversity of wildlife, while producing food. Furthermore, where a solar farm is installed on land which has been intensively farmed, it enables the ground	Site Alternatives Study

[1] https://www.solarpowerportal.co.uk/government_figures_show_a_6-7_increase_in_the_uks_solar_capacity_in_last_ye/

Topic/Comment	No. of people making comment	% of the 103 objections making comment	How this has been addressed	Where to find more information
			underneath to recover, while providing income for the farming business. The majority of the Proposed Development is on Best and Most Versatile (BMV) land. Whilst the preference is to always develop on land not classified as BMV, development on BMV land may not be precluded when there is a lack of alternative sites at lower Grades across the district, and a lack of realistic alternatives with readily available grid connection. Solar farm development is also unlikely to lead to significant and irreversible long-term loss of BMV agricultural land. Indeed, the low intensity regime of a solar farm allows the regeneration of soil quality, ensuring the availability of high-quality agricultural acreage for the future. The planning application is also informed by an Agricultural Impact Assessment which considers the availability of agricultural resource in the local area, an analysis of the ALC grading at Chimmens Solar Farm and the impact of diversifying the landowner's business. There is a significant threat to farming practices across the UK due to the challenges caused by the changing climate, which is having an impact on the viability of some agricultural businesses. Projects like Chimmens Solar Farm can enable diversification of agricultural businesses whilst tackling the effects of climate change. The Site Alternatives Study includes assessment of DEFRA's ALC dataset and concludes on a sequential basis there are no better alternative locations for solar development in the context of Agricultural Land Classification.	

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Impact on land - concrete, lack of crop rotation	2	2%	The panels require no concrete piling: the panels are secured in the ground by metal stakes. The low intensity regime of a solar farm allows the regeneration of soil quality, ensuring the availability of high-quality agricultural acreage for the future.	
Cumulative impact				
Cumulative impact	50	49%	The planning application has been informed by a Landscape and Visual Appraisal, including a cumulative assessment. The Proposed Development has been designed to minimise any potential cumulative impact. The design utilises existing vegetation and includes extensive new planting to reduce potential visibility from local properties.	Landscape and Visual Appraisal Planning Addendum Section 5 and 13
Other Matters				
Should be classed as an NSIP - due to proximity to Horton Wood solar farm	19	18%	Chimmens Solar Farm has a grid connection of 49.9MW and therefore the correct consenting route is under the Town and Country Planning Act, and the application will be determined by the local planning authority Sevenoaks District Council. See Planning Addendum Section 13.	Planning Addendum Section 13
No EIA undertaken	2	2%	An EIA Screening Request was submitted to Sevenoaks District Council. The submission and determination are available on the council's website (Ref: 23/01408/RG5). The decision confirms that Chimmens Solar Farm is not considered to be EIA development.	
SDC does not have a Renewable Energy Planning Policy	1	1%	The Applicant is unable to comment on SDC's policies.	
Plans for another (3rd) solar farm in Horton Kirby	1	1%	There is no formal planning application submission for any future potential development and therefore this is not a material planning consideration. Notwithstanding, the Site	

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			Alternatives Study has already considered all other potential alternative sites and concludes that Chimmens Solar Farm is the most preferred site for solar development.	
Biodiversity /wildlife				
Negative impact on biodiversity / wildlife	46	45%	There are no statutory designated sites within or adjacent to the proposed site. The application is supported by an ecological appraisal, which includes various ecological surveys (breeding bird surveys, wintering bird surveys, Phase 1 and Phase 2 Habitats Surveys). The results of these surveys were used to inform the final design layout of the Proposed Development and inform mitigation measures. The Proposed Development will deliver new landscape and ecological measures and overall the Biodiversity Net Gain for this proposal is 45% net gain in area habitats and a 39% net gain in hedgerow habitats, as a result of the Proposed Development. All of these new habitats will provide significant improvements for all species in the local area. As identified in the Landscape Masterplan, the Proposed Development will create new 35 acres of habitat for skylark within the site boundary and on land immediately north of the solar farm. Furthermore, the new species rich grassland, >480m of native woodland planting and >4000m of new hedgerow planting throughout the Proposed Development site will significantly improve foraging habitat for skylark species both within the immediate site and the wider surrounding area.	Ecological Appraisal Landscape Masterplan Landscape and Ecological Management Plan Planning Addendum Section 6
Impact of light pollution on wildlife and pollinators	1	1%	No floodlighting is required. Inward facing CCTV cameras are equipped with infrared lighting.	

Topic/Comment	No. of people making comment	% of the 103 objections making comment	How this has been addressed	Where to find more information
			The Proposed Development does not incorporate any visible, permanent artificial lighting.	
Residential amenity				
Impact on residential amenity / too near to properties - particularly Saxon Place	36	35%	The site has been chosen as it has good solar irradiation levels, lies outside of any statutory environmental, archaeological and landscape designations and due to its proximity to a viable grid connection. The Proposed Development has been through a detailed design process, and the Applicant has taken account of feedback from the community and stakeholders, as well as the results of site surveys and assessments. This resulted in a number of changes being made to the design to ensure the solar farm fits sensitively into the existing landscape whilst maximising the low carbon, low-cost electricity generation. The design changes made include: • A minimum 100m buffer between residential properties and solar infrastructure; o At the north west of the site, a 200m buffer has been achieved between residential properties and the solar infrastructure. • A minimum 5m buffer of new native woodland screening on the northern boundary of the site; • Changes to inverter and storage locations to benefit from existing mature native hedgerows so that screening will take effect immediately. As well as appropriate setting back of the solar infrastructure, potential visibility will be reduced by existing trees and hedgerow and proposed new and infill native planting. As well as providing screening,	Landscape and Visual Assessment Landscape Masterplan
Absence of a substantial buffer (1000m)	3	3%		

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			the planting will provide wildlife corridors and vital resources for mammals, birds, and insect species. A Landscape and Visual Appraisal provides an assessment of the potential effects of the proposed solar farm on the existing landscape and visual amenity of the site and the surrounding area and accompanies the planning application. A Landscape Masterplan accompanies the Landscape and Visual Appraisal and provides detail on where existing vegetation is retained and where we are proposing significant increases in new native woodland, hedgerows and other ecological enhancements which help achieve significant biodiversity net gain.	
Noise	29	28%	Solar panels themselves do not generate noise. The main noise source associated with a solar farm will be from the project substation and the inverter/battery storage locations. A background noise survey has been undertaken to assess any potential for noise from the Proposed Development and to inform the project design, in consultation with the Council's Environmental Health Officer. The solar farm will operate within agreed noise limits and no adverse noise impacts are anticipated from the Proposed Development.	Acoustic Impact Assessment Environmental Protection consultation response 04/01/2024
Light pollution and impact of CCTV /fencing/ substation	22	21%	No floodlighting is required. Inward facing CCTV cameras are equipped with infrared lighting. The Proposed Development does not incorporate any visible, permanent artificial lighting. The proposals incorporate planting as part of the screening mitigation for the site. This planting, when mature, would effectively screen the site so as not to result in any significant	Solar Infrastructure Layout (Figures 4 and 5) Landscape Masterplan

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			visual impact. The site would maintain an open feel as much as possible with the associated equipment such as CCTV cameras blending into the surrounding as much as possible. As per the Landscape Masterplan, the perimeter fencing is located on the inside of proposed landscaping.	
ProW - negative impact / loss	13	13%	There are two PRoW footpaths in the local area (SD155 and SD333). SD155 is located to the west and the south of the project where it is enclosed by thick vegetation on either side. SD333 crosses within the south side of the site boundary. During construction, there is likely to be a temporary diversion of SD333 within Horton Wood. However, during operation, all PRoW routes are retained and the design of Chimmens Solar Farm includes set back of infrastructure to create a 11.5m space along the route of footpath SD333 as it crosses within the development. Furthermore, a new stile alongside interpretation boards and enhancement of the paths with cellular confinement materials are proposed for the benefit of PRoW users as identified on Landscape Masterplan.	Construction Traffic Management Plan Planning Addendum Section 2
Glint and glare	12	12%	A Glint and Glare Assessment has been carried out and used to inform the design. The results of this assessment have been included in the application. Overall, there are no glint and glare impacts on receptors including residential properties, road, rail, air and pedestrians.	Glint and Glare Assessment and Glint and Glare Technical Note
Panels would lead to an increase in physical and audible wind	1	1%		
Human health - low frequency hum / impact on physical and mental health	8	8%	See 'Noise' above	Acoustic Impact Assessment

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			The electricity generated by solar panels is direct current (DC), which doesn't generate non-ionizing electromagnetic (EM) fields like AC-carrying wires do and so there will be less EM emitted than a typical home. There is also no evidence that EM causes harm to health.	Environmental Protection consultation response 04/01/2024
Safety - chemicals from panels & batteries / fire	2	2%	The Design and Access Statement confirms the control measures designed as part of Chimmens Solar Farm which mitigate the risk of fire ignition and propagation. The design of Chimmens Solar Farm includes fire risk mitigation by design for example, secondary access for emergency vehicles and water storage. Further information is provided in the Fire Risk Statement.	Design and Access Statement Fire Risk Statement
Cultural heritage				
Impact on Grade 1 and 2 listed Mussenden Farm, Anglo-Saxon Burial Ground	21	20%	A Heritage Statement, including an assessment on setting of heritage assets, has been included with the planning application. This report states that there are no heritage assets within the site. Impacts on setting of Grade II listed buildings are anticipated to be at the low end of the spectrum.	Heritage Statement
Ancient Woodland				
Adverse impact on ancient woodland	12	12%	The planning application includes an Arboricultural Impact Assessment, Arboricultural Method Statement and further information has been provided to the Sevenoaks DC trees officer during the formal consultation process. The design of Chimmens Solar Farm achieves a 15m buffer of ancient woodland and no trees will be lost as part of the proposal. There will be long term benefits to the protection of Horton Wood with the installation of a cellular confinement scheme on existing access tracks within the woodland.	Arboricultural Impact Assessment Arboricultural Method Statement Landscape Masterplan Planning Addendum Section 7

Topic/Comment	No. of people making comment	% of the 103 objections making comment	How this has been addressed	Where to find more information
Woodland has already been cleared for overhead lines	4	4%	Chimmens Solar Farm does not have planning permission and therefore no physical works have been undertaken at this time.	
Flooding				
Concern about flood risk	10	11%	The Flood Risk Assessment confirms that the site is located in Flood Zones 1 (low probability of flooding). As the panels and sensitive infrastructure will be raised above ground level, the risk of adverse impacts from flooding is very low. Environment Agency data suggests no historical flood events. FRA considers the BESS to be "essential infrastructure". The most likely scenario of discharging surface water runoff is via infiltration. Proposed sustainable urban drainage strategy (SuDS) is permeable surfaces (crushed permeable stone and grass) and additional swales as per the consultation with Lead Local Flood Authority.	Flood Risk Assessment Planning Addendum Section 9
The area already suffers flooding	4	4%		
Site selection				
Site alternatives – brownfield / rooftops	18	17%	The proposed Chimmens Solar Farm planning application is supported by a Site Alternatives Study which considers the grid capacity, use of agricultural land and green belt, availability of sites (including Brownfield sites) to host solar within SDC. The Site Alternatives Study identifies that a significant amount of land with SDC is Greenbelt and therefore	Site Alternatives Study
Sequential test (why this site is most appropriate) not provided	5	5%		

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			unavoidable when finding suitable sites to host ground mounted solar development. There is insufficient brownfield land in the District to accommodate the large-scale solar deployment required to achieve net zero targets. Furthermore, according to the SDC Brownfield site register, there are no brownfield sites suitable (in terms of size) for a solar farm and in proximity to grid (with capacity). Whilst emphasising the need for more rooftop generation, the latest Energy Security Strategy continues to recognise that ground-mounted solar is also important because it is able to contribute a much larger amount of generation than rooftop and can be quick to deploy. It will be extremely difficult for the government to achieve its goal of 70GW solar electricity by 2035 without the use of ground-mounted solar sites. In June 2021, Solar Energy UK, published an analysis estimating that, residential and commercial development is expected to account for nearly 37% (15GW) of the projected 2030 solar PV deployment of 40GW, with the remaining 63% (25GW) coming from large scale ground mounted solar farms.	
Supportive on renewable energy, but not in this location	1	1%	When considering the most appropriate locations for solar development, there are a number of requirements for a site to be viable and suitable. Other criteria include, but are not limited to: • Suitable location which benefits from sunlight intensity levels. • Suitable grid connectivity.	Site Alternatives Study

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			• Site of suitable shape, orientation and size that can accommodate the development proposals. • Suitable location which is served by appropriate highway infrastructure. • Suitable site which is available for the duration of the development. • Not located within a sensitive area as defined by the EIA Regulations. As identified within the Site Alternatives Study, the site meets the criteria outlined above.	
Alternatives				
Technology alternative - wind turbines preferred	5	5%	A future balanced energy mix is vital to improve the reliability and resiliency of the energy grid and helps to ensure affordability for customers. Experience and research show that it's important to avoid overdependence on any single fuel type. The future energy mix will be a diverse menu of low-carbon and renewable energy technologies, all pulling together to meet the net zero targets. Other renewable technologies will have their own merits in relation to cost, efficiency, environmental or social benefits.	N/A
Efficiency				
Proposed solar farm is inefficient - electricity output is comparatively low when compared to other sites	8	8%	The Planning Addendum provides further clarification on the planning application boundary (244 acres) and the buildable solar PV area (167 acres) which aligns with national renewable energy guidance and solar schemes already consented in the area. Both the proposed Chimmens Solar Farm and the consented Horton Wood Solar Park are comparable in size and capable of producing 49.9MW of renewable electricity.	Planning Addendum Section 13

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			Technological advancements in solar panel manufacture in recent years has been significant. This includes an industry standard move towards the use of the more efficient Monocrystalline (single crystal) technology. Monocrystalline solar cells are made from a very pure form of silicon, making them the most efficient material when it comes to the conversion of sunlight into energy. Furthermore, we are proposing the use of bifacial modules for the Proposed Development, which as the name suggests, have two sides of solar cells, enabling additional energy generation from the reflected and diffused light on the rear-side of the panels. Solar panels do not require direct sunlight to produce energy – diffuse sunlight is sufficient, and a grass surface reflects enough light to justify the use of bifacial modules. The use of bifacial panels means that there is potential to produce more electricity in less space.	
Inefficient - general	4	4%	While solar panels obviously do not generate power at night when it is dark, they fit well into a portfolio of different generation technologies because their generation is easy to predict – we know precisely when sunrise and sunset occurs, as well as likely seasonal variability, so they can be easily integrated with the variability of the grid. Modern solar panels take in daylight for power generation, and so do not need direct sunlight to work. In fact, they will even be able to produce electricity on rainy, overcast days, although they are at their most effective on clear, bright days.	
Climate				
Solar farms have a negative impact on climate change	4	4%	If consented, Chimmens Solar Farm would be capable of producing clean, green electricity for around 19,194 homes every year and save up to 32,000 tonnes a year of CO^2 to electricity generated from fossil fuels. This would have a	

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			positive impact on climate change by saving over 1.2 million tonnes of CO^2 during the lifetime of the project. As with all manufactured products, some carbon is emitted in the manufacture of solar panels. Research has shown that the average carbon payback period for solar panels is 1-4 years. This means that over their lifetime, typically 40 years, each panel will generate zero-carbon and zero-pollution electricity for decades after any carbon emitted in its production has been paid back.	
Construction and access				
Construction – additional traffic / congestions already an issue	33	32%	Access to the site has focused on minimising potential traffic disruption during the construction period. At the public consultation event, views were expressed about existing congestion problems at the village in Horton Kirby. The design of the Proposed Development avoids Horton Kirby village and minimises the use of narrow roads. The construction traffic access strategy, as identified in the Construction Traffic Management Plan (CTMP), identifies a suitable delivery route via A20>Scratchers Lane>Three Gates Road and Gabriel Spring Road East. The planning application includes a CTMP that commits the construction deliveries to the delivery route identified.	Construction Traffic Management Plan Planning Addendum Section 8
Construction access - narrow lanes / Mussenden Lane; number of HGVs	19	18%		
Construction – safety	6	6%		
Construction - general disruption	3	3%		
Construction - pollution	8	8%		
Construction - impact on ancient woodland and soil	7	7%	See “Ancient Woodland” above The low intensity regime of a solar farm allows the regeneration of soil quality, ensuring the availability of high-quality agricultural acreage for the future.	Planning Addendum Section 7
Construction - mining issues	4	4%	The Applicant is committed to building its sites with only manufacturers and contractors who have pledged to prevent modern slavery in the supply chain. The balance of system components are generally sourced from the UK and EU. The	Further information can be found on the RES website: https://www.res-group.com/modern-slavery/
Construction - slave labour	4	4%		

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			Applicant is a member of the Solar Energy UK and subscribe to their Responsible Sourcing Guidance and best practices.	
Construction - carbon footprint / panels not recyclable	4	4%	The project will lead to a reduction of approximately 32,000 tonnes of CO2 emissions every year, which during its lifespan will overwhelmingly offset the energy generation emissions used to manufacture the plant, cables and decommissioning. The carbon emissions from PV sites are much lower over their lifecycle than fossil fuel alternatives, including their embodied emissions. In most cases, 99% of a solar panel is recyclable, and there are established industrial processes to do this. Although solar is not a new technology, large scale production only began in recent years due to plunging costs and increasing efficiency. This first generation of panels is only now starting to come to the end of its life, which is why there hasn't been large scale solar panel recycling in the UK up until recently. 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 an encapsulant material which bonds the layers of a panel together. However, there are established processes for recycling solar panels. There are organisations around the UK and Europe specialising in solar recycling, such as PV Cycle and the European Recycling Platform. They are working with solar developers to minimise electrical waste and recycle old panels in line with the Waste from Electrical and Electronic Equipment (WEEE) regulations.	Australian research finds cost-effective way to recycle solar panels | Recycling | The Guardian The Engineer - Greener method for recycling thin-film solar cells Researchers find alternative way to extract high purity silver from used solar panels | News | University of Leicester

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			In addition, solar recycling methods are constantly being improved through research, as shown through recent publications from the University of New South Wales, Sweden's Chalmers University of Technology and the University of Leicester.	
Construction - impact on horse riders	1	1%	There are two PRoW footpaths in the local area (SD155 and SD333). SD155 is located to the west and the south of the project where it is enclosed by thick vegetation on either side. SD333 crosses within the south side of the site boundary. During construction, there is likely to be a temporary diversion of SD333 within Horton Wood. However, during operation, the design of Chimmens Solar Farm has retained all existing PRoW routes and includes 11.5m space along the route of footpath SD333 as it crosses within the development. Furthermore, educational boards are proposed along the route of SD333 for the benefit of PRoW users. As demonstrated in the Planning Addendum Section 2 and Figure 20 Horse Riding Track, the design of Chimmens Solar Farm will retain and protect all recreational horse riding routes.	Planning Addendum Section 2 Figure 20 Horse Riding Track
Construction - impact on ProW	1	1%		
Construction - impact on wildlife	1	1%	See Biodiversity /wildlife above.	
Highways report - highlights incidences and fatalities	1	1%	See Planning Addendum Section 8	
Operation				
Operational traffic	4	4%	The operational traffic would be a light goods van visiting a couple of times a month. Active monitoring is carried out by the Operations & Maintenance (O&M) team and site	N/A

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			manager which can reduce site attendance through early fault detection.	
Highways report - under-estimated no. of vehicle movements as a result of sheep grazing	1	1%	Sheep grazing will not generate significant amounts of traffic during operation of the solar farm.	
Decommissioning				
Return to agricultural use questioned	8	8%	The solar farm does not contain any permanent infrastructure and is entirely reversible at the end of its operational lifetime and the land can returned to its previous use. After the lifetime of the project, the solar farm will be decommissioned by a specialist recycling company. A decommissioning bond will be set up and maintained throughout the lifetime of the project. The land will be reinstated to its original form.	N/A
Unclear plans on decommissioning	5	5%		
Decommissioning - carbon footprint	3	3%		
Financial bond for decommissioning required	1	1%		
Greenwashing				
Claims the solar farm will reduce energy prices is untrue	5	5%	As we transition to a net-zero future, reducing the impacts of climate change both locally and globally, RES' priority is to deliver clean, green electricity at the lowest cost for consumers. New analysis on electricity generation costs published by BEIS shows that large-scale solar, alongside onshore and offshore wind, are now the cheapest forms of electricity generation. This makes developments like Chimmens Solar Farm not just good for the environment but also for the consumer. As a country, we still rely heavily on gas for the generation of electricity (nearly 50%) so the increase in worldwide gas prices does have an impact on the commodity price of electricity. Currently in the UK market, wholesale electricity prices are set by the most expensive form of generation – i.e.	N/A
Greenwashing	1	1%		

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			gas-fired generation Until renewables command the highest per cent of generation in the UK, gas will continue to determine the price we pay for our electricity. In 2021, renewables were responsible for 29% of the electricity generation in the UK. This alone displaced around £6.1 billion worth of gas, equivalent to £221 of gas per household. Carbon Brief analysis[2] shows that nearly 90% of the increase in bills over the last year is due to the rising price of gas, which has more than tripled over the same period with most of the remaining increase in bills is due to the cost of energy suppliers going out of business. While the UK has gone a long way to move away from fossil fuels and into renewables, we still have a system that is reliant on global gas supplies for our electricity and heating. Building more home-grown renewables will mean we don't have to rely on volatile gas pricing bringing the cost down over time and increase security of supply.	
Community benefit				
No benefit for local people	19	18%	As we transition to a net-zero future, reducing the impacts of climate change both locally and globally, the Applicant's priority is to deliver clean, green electricity at the lowest cost for consumers. RES is committed to ensuring that, wherever possible, local contractors and employees are used in all aspects of solar farm development. The major opportunities arise during the construction phase when suitably qualified local firms are	N/A

[2] https://www.ofgem.gov.uk/energy-data-and-research/data-portal/wholesale-market-indicators

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			often invited to bid for different aspects of construction. The Applicant encourages contractors to source construction materials locally and to use local transport and plant hire companies where possible, in addition to local services and amenities. In addition, the Proposed Development would deliver significant business rates over its lifetime, supporting vital local services for all local residents. The Applicant firmly believes renewable projects should deliver local meaningful benefits and also believe it is important that any community benefit package is informed and decided by the local community. Throughout the pre-application consultation, feedback was requested from the local community on local benefits they would like to see delivered in their community, if the Proposed Development is consented. Ideas received include: an apprenticeship schemes, electricity discount, a new or improved local playground, a new burial ground, refurbishment of local tennis courts, new footpaths in the area of the solar farm and improvements to local roads. The Applicant is actively working with local stakeholders to refine a community benefit package to be delivered by the Proposed Development. It is important to note that community benefits are not a material planning consideration.	
Consultation				
Criticism for submitting over the Christmas period	2	2%	The application was submitted to SDC on 1 November 2023; however, it was not validated until 19 December 2023, which is outside of the Applicant's control.	N/A

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Calling it 'Chimmens' is deceptive/hiding it from locals - the area is known as Speedgate	3	3%	The name “Chimmens” comes from a common name associated with one of the fields within the site.	N/A
Lack of consultation	2	2%	The pre-application public consultation began in May 2023 when the Applicant wrote to the MP, County and District councillors, and local parish councils to introduce the scheme and offer briefing meetings. A letter was also sent to near neighbours at this time, and a website launched. An exhibition was held on 10 July 2023, which was widely publicised, and gave the opportunity to provide feedback. For those unable to attend the event and without internet access, hard copies of the exhibition materials were made available upon request. On 20 July 2023, the Applicant sent a follow-up newsletter to residents of Saxon Place informing them of the project, advising on how to find out more and submit feedback. The follow-up newsletter was sent after one of the residents of Saxon Place commented at the public exhibition that not all of his neighbours had received the newsletter about the event. The Applicant is committed to maintaining an open dialogue with the local community and stakeholders throughout the determination phase.	Statement of Community Involvement (Section 5)
Saxon Place - no invite to the consultation	2	2%	The Applicant sent a newsletter to 899 properties, which included details of the exhibition. An advertisement was placed in the Sevenoaks Chronicle, on 29th June 2023 for 1 week. The advert was also placed by parish clerks on their respective social media pages and parish council websites. An article was also published in Kent Online. All of these included the project website, which had details of the	Statement of Community Involvement (Section 5)

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			consultation. A follow-up newsletter was also sent to the residents of Saxon Place. As part of the Public Exhibition, the Applicant undertook additional engagement with those living closest to the Proposed Development including Saxon Place Residents Association. An early newsletter was sent out to these nearest neighbours, giving them advanced notice of the proposal and the upcoming consultation, and the exhibition included a dedicated session 11am-1pm on the 10th July 2023. This session was attended by a representative of Saxon Place Community Association. The publicity for the consultation is deemed adequate and is in-line with SDC's Statement of Community Involvement.	
Event held in Fawkham not Horton Kirby	1	1%	We understand the concern regarding the exhibition being held in Fawkham village hall. Horton Kirby & South Darenth was our first choice of location for the exhibition. However, when we made enquiries regarding hall hire, there was no availability for a full day booking (due partly to end of term / school holiday events). We require the venue all day due to the setup times required. We considered multiple other venues, and the next best option was Fawkham Village Hall. It is a host parish council and was chosen due to its proximity to the site and its availability. All materials provided at the Public Exhibition were also available on our website. There are also contact details there for anyone who wishes to ask questions, and the same team who facilitated the Public Exhibition responded to any further queries during the informal consultation period in	Statement of Community Involvement

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			July 2023. Feedback forms were made available through the website, using an online copy of the same feedback form we are providing at the event.	
Objections to other applications ignored by SDC / too many in the Horton area	11	11%	The Applicant cannot comment on other applications determined by SDC.	N/A
Developer / landowner profit	5	5%	An Agricultural Impact Assessment has been provided to support the planning application. Chimmens Solar Farm proposes a temporary change of agricultural practices in a long established farming business. The proposal will include dual agri-solar use of the site whereby solar electricity generation alongside sheep grazing and therefore the entire development area retains the agricultural side of the existing farming business. The Agricultural Impact Assessment also demonstrates that the proposed development will diversify the existing Speedgate Enterprises Ltd aligning with NPPF Paragraph 84. Chimmens Solar Farm will create long term sustainable income from clean, green renewable energy which will protect and promote employment at the existing farming business.	
Impact on property prices	4	4%	Property value is subjective and can be affected by a range of factors. There is no firm evidence on whether UK solar farms do or do not affect house prices. The Applicant is aware of residents close to other renewable energy projects, who enjoy having renewable energy projects close by and believe that they add value to their community. Potential impact on local properties, in terms of noise, visibility and glint and glare, have been assessed as part of the preparation of the planning application and design changes and mitigation measures have been adopted where appropriate to minimise any potential impacts.	

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Concern the site will be sold	1	1%	It is common across the industry for projects to change hands over their operational lifetime. However, the conditions associated with the planning application ensure that the project is maintained to the agreed standard. This includes decommissioning of the site. As well as solar design and development services, the applicant also provides solar asset management and full-scope solar O&M services and would seek to maintain an interest in the solar farm, throughout its operational life.	
Planning application is misleading: - documents misrepresent, mislead, deflect, distract, obscure, disregard and patronise - omits houses in Saxon Place	2	2%	A Public Exhibition was held in July 2023 with all preliminary designs available. The planning application has been made available both on the project website and on the planning portal. The consultation period has been extensive with comments made during January, February and March 2024.	