Kent County Council

Position Statement on Solar Developments

1. Introduction and Background

1.1 Kent County Council (**KCC**) published a document in 2014 titled "*Development of Large-Scale Solar Arrays*", which sets out their position on the delivery of photovoltaic development ("**Solar Developments**") in KCC's administrative area (the "**2014 Position Statement**"). This document replaces the 2014 Position Statement.

1.2 KCC is not the local planning authority (i.e. Borough or District Council) for determining planning applications for Solar Developments but is a statutory consultee on such developments. It acknowledges that a local planning authority will determine planning applications in accordance with their statutory development plan unless material considerations indicate otherwise.

1.3 KCC is the local highway authority, education authority, waste disposal authority, mineral planning authority and the local flood authority in Kent.

2. **Summary** of KCC's Position

2.1 KCC is in principle supportive of Solar Developments where they have the potential to maximise the social, environmental and economic benefits that solar provides.

2.2 KCC considers that Solar Developments:

(a) should be well-designed and appropriately located, which is consistent with its commitment to protecting valued landscapes, habitats, heritage, and agricultural land.

(b) require careful consideration and should not be located on Best and Most Versatile (BMV) agricultural land (grades 1 to 3a).

2.3 KCC acknowledges that co-located Battery Energy Storage Systems (BESS) storage is generally necessary to make solar farms viable; however, KCC does not support grid-scale BESS.

2.4 KCC considers that BESS should only be co-located if "a" and "b" policy positions above are satisfied, and that the clearly evidenced safety measures described in paragraph 7 of this Position Statement are in place.

2.5 KCC does not support applications for ground mounted solar arrays that do not have a grid connection secured with the Distribution Network Operator

(DNO)/National Grid Electricity Transmission (NGET) at the time the application is submitted.

3. Preferred Solar Developments

3.1 Where applications for Solar Developments are aligned with development plans' policies, the National Planning Policy Framework, Kent Design Guide and any other relevant considerations, Solar Developments will be encouraged on:

- Rooftops of homes, council buildings, schools, commercial premises, warehouses, community facilities, agricultural properties or rural businesses that do not have a harmful visual impact on the landscape in which they are located.
- Car parks and solar carport canopy systems.
- Community-led ground-mounted installations, integrating local ownership (in part or in full) and benefit, where evidence is provided that demonstrates roof or wall- mounted provision has been considered and why this is not feasible.
- Brownfield or former industrial land, integrated with compatible land uses such as grazing, horticulture, and/or nature recovery.
- Properties participating in collective purchasing schemes in Kent, which offer vetted installers, competitive pricing, and optional battery/electric vehicle charging support.
- Established sites, where applications are for the repowering or life extension of an existing renewable site.

4. Management of Solar Development

4.1 KCC considers:

(a) that Solar Developments have the potential for considerable impact on the surrounding environment and should therefore be carefully considered by local planning authorities.

(b) that Solar Developments that conflict with the conservation or enhancement of environmentally sensitive areas should be discouraged on:

- Protected landscapes such as the Kent Downs and High Weald National Landscapes, or land adversely affecting their setting (unless, through community engagement and consultation processes, local residents consider the benefits of the development to outweigh the potential adverse effects).

- Green Belt except where the tests for very special circumstances under the National Planning Policy Framework are met.
- Sites of high ecological or historic value, including ancient woodlands and priority habitats.
- Sites that cause harm to the significance of designated heritage assets or their settings.
- Best and most versatile agricultural land (Grade 1, 2, and 3a), unless the benefit to the agricultural land outweighs the impact.

5. Cumulative impact

5.1 KCC considers that:

(a) the cumulative impact of Solar Developments, particularly where multiple schemes are proposed within protected landscapes, valued countryside, or areas experiencing rapid growth in renewable infrastructure, can have a considerable impact and should be addressed by developers/applicants.

(b) Considerations could include:

- Combined loss or fragmentation of habitats,
- Combined landscape character change across wider areas,
- Sequential or combined visual effects from multiple developments, and
- Cumulative traffic and construction impacts.

6. Environmental Protection and Resilience

6.1 KCC considers that:

(a) Solar Developments should be designed to avoid significant adverse effects on biodiversity, soils, water, heritage and landscape, and to be resilient to flood and climate risks. Planning applications should demonstrate how impacts are avoided, minimised, and mitigated, and how net benefits will be delivered and maintained over the scheme's lifetime.

(b) Solar Developments should be encouraged where there is:

- Use of nonreflective coatings and recessive colours to minimise visual impact and potential harm to wildlife. Where near dwellings, transport corridors, or aviation assets, a glint and glare assessment with mitigation should be provided.

- Submission of an Ecology Management Plan (including under-panel habitat management) setting out landscape and biodiversity enhancements, including habitat buffers, wildflower corridors, or nature recovery measures. Nature recovery measures should be in line with those in the Kent and Medway Local Nature Recovery Strategy.

- Flood Risk Assessment and drainage strategy, including nature based Sustainable Drainage Systems.

- Incorporation of bunds, filter drains or other measures to interrupt flows of water between rows of solar arrays, to disperse flows over the surface, and promote infiltration into the soils.

- Placement of wide grassed filter strips at the downstream side of blocks of solar arrays and maintenance of the grass at a long length to interrupt water flows and promote infiltration.

- Incorporation of gravel filled filter drains or swales at the downstream side of blocks of solar arrays to help infiltrate run-off (where ground conditions allow).

- Vegetated strips through a combination of wildflowers and or grass along with buffer strips around the perimeter of the fields left uncut to capture any runoff leaving the site.

- Historic and ecological assessments where relevant, with early engagement with KCC specialists.

- Public Rights of Way (PRoW) remain open and safe, with temporary closures only by prior agreement with KCC.

- Minimal disruption to local and strategic road networks, including appropriate construction management.

- A Construction Environmental Management Plan addressing dust, noise, traffic, soil handling, runoff, ecological protection, and PRoW management.

- Decommissioning plans to restore the land at the end of life (typically 25–30 years), ensuring land can return to its former use or equivalent quality within three months.

7. Fire safety and Battery Energy Storage Systems (BESS)

7.1 KCC recommends that planning applications for BESS should ensure:

- BESS compounds are located at least 25m from occupied buildings (National Fire Chiefs Council guidance).
- Two independent emergency access points, allowing for upwind approach where possible, plus onsite turning space.
- Evidence of adequate firefighting water supply (hydrants, static tanks or alternative measures) and contaminated runoff containment, recognising controlled burn tactics may be required.
- An Emergency Response Plan covering system isolation, shutdown, venting strategy, hazardous plume modelling, cordon requirements, and post incident monitoring.

8. Conclusion

8.1 KCC supports Solar Development in principle, where it has the potential to maximise the social, environmental and economic benefits that solar provides.

8.2 KCC recognises the importance of solar generation for UK energy security and economic development. However, it considers that Solar Developments can have significant impacts on surrounding communities and the environment.

8.3 Kent, with its high levels of solar irradiance, is considered a favourable area for solar generation, and the cumulative impacts of multiple projects across the county must be carefully considered by local planning authorities. The collective impact on food security of using high grade agricultural land for energy generation, which KCC discourages, may also become significant as deployment of ground-mounted solar accelerates. KCC therefore encourages solar generation to be prioritised on rooftops, carparks, and brownfield land over ground-mounted installations on greenfield and BMV agricultural land.