#### **Solar Panels:**

- What will influence the choice of fixed tilt or single axis tracker solar structures for the solar array?
- What are the precise maximum and minimum dimensions for both fixed tilt (FT) and single axis tracker (SAT) solar panels that will be assessed within the "Rochdale Envelope"?
- How tall will both the fixed tilt and Single axis tracker solar panels be at their highest point from the ground including flood risk mitigation measures?
- If the solar panels move to follow the sun, how will this affect their spacing, height or appearance throughout the day?
- What are the precise maximum and minimum values for the ground clearance and row spacing of both fixed tilt (FT) and single axis tracker (SAT) solar module mounting structures?
- How will the selection of specific solar module types (e.g., 400-900W DC capacity) impact the overall footprint, visual characteristics, and potential for glint/glare from the solar arrays?
- How much energy will the solar panels actually generate compared to their installed capacity given the extreme intermittency of sunlight in the UK?

### **Battery Storage (BESS):**

- Does 400MW refer to the total battery power capability? If so, please provide energy storage capacity figures in MWh alongside the power capability.
- What regulations apply in terms of health, safety and siting of large-scale battery storage systems? How will they be regulated and complied with and who is responsible for this?
- How much energy will the batteries store generated by the solar array and how long can they discharge the energy for?
- Why is there double the MW amount of installed battery capacity to installed solar capacity?
- Will the batteries import/export energy from other sources?
- Why is the BESS sited so close to residences on Wills Lane? Can it be located further away from properties given the fire risks and the distance and time it will take for fire services to reach the site in the event of fire?
- What will the battery storage buildings look like, and what will be their maximum height including flood risk mitigation measures?

# **Fencing and Security:**

- What kind of fencing will be put around the site, and how tall will it be? How will it be screened? And will it be made wildlife friendly for ground-roaming mammals?
- What is the proposed maximum height and type of the security fencing, and how will its visual impact be specifically mitigated, particularly where it adjoins Public Rights of Way (PROWs)?
- What will the height be of any security cameras or lights on tall poles? What direction will they face?
- How will you prevent thieves and hare coursers from cutting through the fencing and breaking into the site?

### **New Substation:**

- Why is a new National Grid substation needed when there is an existing unused substation at Dungeness?
- What will a new NG substation look like, how much land will it occupy and how tall will its equipment be? Is it likely to be located within the project site?
- When will National Grid decide on the location? Will it go through national planning or local planning? What
  is the timeline relative to the Shepway Energy Park application timeline? What happens if the NG substation
  does not go ahead?

#### Permanent Infrastructure:

• How many permanent storage areas, welfare buildings, parking facilities, and spares buildings for operations and maintenance are required and where will they be located? What are the precise dimensions (length, width, height) for them? What planning processes will they go through if they are permanent?

#### **Glint & Glare:**

- How much glare or reflections from the solar panels could affect nearby homes, roads, or aircraft?
- How will you identify sensitive receptors, such as residences, and what will you do to mitigate glint and glare to comply with legal requirements?
- How will glint and glare be monitored during the operational phase to ensure mitigation is adequate, and if it is inadequate what mechanisms will there be for those impacted to complain so that it is addressed?
- Will you provide site specific 3D glint/glare modelling for all affected properties?

# Wildlife, Ecology & Biodiversity:

- How will you protect local wildlife and their habitats during and after construction? How will the effectiveness of this be monitored through the construction and operational stages?
- What steps will you take to improve biodiversity on the site compared to the current baseline, beyond just planted screens?
- How will the Scheme demonstrate achievement of a Biodiversity Net Gain (BNG) greater than the minimum 10% required by the Environment Act 2021, and what specific metrics will be used for measurement?

## Water, Drainage & Flood Risk:

- How will the project affect local water sources, such as ditches, streams, or groundwater?
- How will you ensure that the quality and quantity of local water is not negatively impacted by the project?
- The scheme lies within a high risk flood zone due to tidal levels and is situated on marshland with a high water table. Given predicted sea level rise and flood risks associated with global climate change which cannot be mitigated at a local or even national level, how will you mitigate against flooding in 20, 30 or 40 years?
- What plans do you have to prevent flooding on or around the site from other sources such as runoff, or damage to and wear and tear of existing land drainage?
- What kind of sustainable drainage systems are you planning to use to handle the runoff, especially since Romney Marsh often has wet and waterlogged soil? How will you prove these systems will work effectively?
- How will you ensure existing land drainage systems that cross under the fields are not damaged during construction and how will they be repaired if they become damaged during the 40 years of operation?
- What cumulative flood risk assessment has been done for the whole Marsh considering the scale of impermeable surfaces proposed e.g. for the battery storage and required buildings.
- How will ongoing monitoring and maintenance of drainage and SuDS be ensured?

# **Soil Quality:**

- Will the agricultural land classification assessment be an independent study? How many samples will be taken and from where across the sites?
- What will happen to the soil quality on the agricultural land used for the solar farm, especially if the construction traffic runoff from panels leads to soil compaction, and if large amounts of cement or aggregate are used on site?

• How can it be guaranteed that the land will be fit for farming in 40 years time, and especially in better state than it is now? What evidence exists of this happening in reality?

### Mitigation (Performance & Enforcement):

- What specific performance indicators or metrics will be used to measure the effectiveness of all proposed mitigation measures (e.g., for noise reduction, dust suppression, visual screening, biodiversity net gain)?
- How will the Development Consent Order legally secure the long-term implementation and maintenance of all proposed mitigation measures, particularly those extending beyond the construction phase, such as landscape planting and ecological enhancements?
- How will the developer and operator be held accountable for all mitigation and enhancement measures if the targets are not attained?
- What are the measures to ensure that the "good practice landfill diversion target of 90%" for construction and demolition waste is achieved, and how will it be monitored and reported on over the life of the project?

## **Health & Safety:**

- Will any hazardous materials be transported to and/or stored on site, especially for the battery storage system? What are the risks to nearby residents and businesses?
- What are the safety plans in case of a fire, thermal runaway or other emergency at the BESS facility?
- How much water will be required to deal with solar panel fires or a fire at the battery storage units? Where will it be stored?
- In the event of extreme wind events (common on the flat open landscape of Romney Marsh), how will damage to solar and battery infrastructure be prevented from damaging nearby people and properties?
- What steps will you take to assess and mitigate risks from UXO (unexploded ordnance explosive weapons like bombs, grenades or mines that did not detonate when they were deployed and still pose a risk of explosion) given the area's WWII history?

#### **Public Right of Ways (ProWs)**

- Will ProWs within the site be maintained for public access during the construction and operation stages?
- Will there be any temporary diversions of ProWs? How will the "Framework ProW Management Plan (PWoWMP) specifically ensure that "any temporary diversions of ProWs...will be monitored to ensure that they are suitable and well maintained for use" throughout the construction period?

# **Construction Impacts & Traffic Management (Technical Aspects)**

- What specific criteria will be used to assess the "suitability" of existing local roads for HGV movements, and what are the thresholds for triggering road upgrades?
- How much concrete will be needed for the scheme and what state will it arrive in (ready-mixed or dry for on-site mixing)? How will it impact the soil health?
- What will be the carbon footprint of the lorries bringing construction materials to the sites?

## **Operational Impacts (Technical Aspects)**

- What will be the main sources of noise from the solar farm once it's running?
- How will you ensure that operational noise levels do not disturb nearby homes?
- Will there be any continuous lighting on the site at night once it's operational?
- How often will maintenance vehicles visit the site once it's operational, and what routes will they use?

# **Cumulative Effects (Technical Assessment)**

- Why only a 5 km search area for SSE for identification of other development schemes for a cumulative effects assessment?
- How will the cumulative impact assessment specifically consider the combined effects of this solar farm with the proposed new NGET substation, given that it is a separate project with its own planning application?
- How will the cumulative impact assessment specifically consider the combined effects of this solar farm with other proposed solar and/or battery storage schemes, such as St Mary in the Marsh Solar Farm that borders the south of site 6, given that it is a separate project with its own local planning application, or other schemes that are being scoped and are yet to be submitted to the Planning Inspectorate for a Scoping Opinion or Pre-application approval?

### **Baseline Data & Surveys**

- For baseline data that is "in progress" or "not yet commenced" (e.g., detailed ALC surveys for cable corridors, specific ecological surveys), what is the timeline for completion, and how will these findings be integrated if they reveal unforeseen significant impacts?
- What is the justification for excluding detailed ALC surveys for the Interconnecting Cable Corridors and Grid
  Connection Route until "post-Development Consent Order," given that these areas are predominantly Grade
  1 and 2 and subject to temporary disruption?
- What specific data sources, beyond "current baseline," will be used to forecast future landfill capacity and material availability, given the acknowledged "uncertainties" in the Scoping Report?
- How will the "1 week minimum" long-term baseline sound monitoring capture seasonal variations in ambient noise, particularly from agricultural activities and light aircraft, which may not be seen over a short period?
- What is the justification for not undertaking water quality sampling, and how will the "risk assessment basis" adequately characterize potential pollution impacts without direct baseline data?
- What specific pre-construction surveys are planned, and how will their findings directly inform the final detailed design and mitigation strategies before construction commences?

## **Materials & Waste**

- How will the "construction material estimates... based on other similar Solar NSIP schemes" be adapted to the specific geological and logistical conditions of the Shepway Energy Park Site?
- What are the specific plans for the disposal and recycling of solar modules and BESS components at the end of the 40-year operational life, and what are the anticipated waste streams and volumes?

### **Site Selection, Suitability and Alternative Sites**

- Will existing business or residential properties be subject to compulsory purchase at any point in the development process?
- Why has SSE chosen sites that are extremely inaccessible due to the character of the rural roads on Romney Marsh, especially the single track lanes leading to many of the access points marked on the map?
- Siting a vast solar and battery scheme south of and adjacent to the Kent Downs National Landscape and at a lower elevation will create visual harmfor the KDNL. Why has SSE chosen a location that will damage views across an Area of Outstanding Natural Beauty?
- Will the landowners be subject to CPO of the land freehold?
- Will you publish a Food Security Impact Assessment comparing the solar scheme's energy yield to the agricultural output lost?
- What happens when landowners pass away and Inheritance Tax thresholds require the land to be sold? Is there a risk it will pass out of agricultural ownership forever, and thus be open to different types of development in the future?

### **Project Design & Technical Specifications**

- For each component where the design is not yet finalized (e.g., specific cable routes, BESS configuration, solar module type), when will all this be made clear?
- Where will the energy generated be sold/used?

#### Cabling

- Will the cabling cross land that is not included in the redline boundary? Will SSE need to enter into leases for or compulsory purchase additional land that is needed for cabling?
- Why aren't the land parcels closer together to avoid so much cabling?
- What are the dimensions of the trenches for LV, MV, and HV cabling and what are the maximum working corridor widths anticipated for both open and trenchless methods?

#### **Access**

- What are the main routes proposed to reach each site from different directions without having to pass through the village?
- How will HGVs access the sites when many of the roads leading onto the sites are already in very poor condition and not suitable for HGVs.
- What are the specifications for the access tracks, including maximum width and material composition, and how will their construction impact soil and drainage?

### **Screening and Landscape Mitigation**

- How will you ensure that the Shepway Energy Park blends in with the local landscape, especially given the flat, treeless and open nature of Romney Marsh?
- What kind of new trees or hedges will be planted to screen the panels, BESS and substation from view?
- How will the scheme be screened from the sightline of villages and public rights of way on the escarpment above the Marsh? How tall will the screening need to be to avoid harm to visual amenity at all public viewpoints on the escarpment without ruining the overall view across the Marsh?
- How will you ensure that new planting doesn't change the open character of the area?

### Visual Impact and amenity

- How will you protect residential amenity and local views?
- What specific measures will be implemented to ensure that the "wholesale introduction" of hedgerows and tree planting does not "compromise the key qualities of openness" of Romney Marsh, as acknowledged in the report, while also reducing visual impact for residents and visitors to the Marsh and to the Kent Downs National Landscape area?

#### **Flooding**

• If the scheme leads to localised flooding affecting properties, how will the developers compensate affected properties?

### **Ethical Considerations**

 How will SSE prove that the construction materials, including resources used for solar panels and batteries, comply with modern slavery laws and that they have not damaged the environment or used forced labour or other unethical practices in their manufacture?

#### **Construction Impacts & Traffic Management**

- When do you plan to start construction noting it is anticipated to be operational by 2033?
- How will you manage construction traffic to minimise disruption to residents and businesses?

- Who will be responsible for repairing the roads in the event of damage?
- Where will the on-site water supply come from?
- Who is responsible for financing and delivering road upgrades if they are needed?
- Who is responsible for financing and repairing damage during construction, such as damaged verges, potholes, property damage, broken utility infrastructure such as overhead telephone lines and underground water pipes?
- What mechanisms will be put in place for residents and road users to claim for damages incurred by deteriorated road conditions and construction traffic movements?

### **Operational Impacts**

- Will sheep or other animals be allowed to graze among the solar panels, and how will this be managed, especially as many of the landowners are arable farmers? For example, will the land be leased by the developer to sheep farmers or will the landowners be responsible for arranging sheep grazing themselves?
- How sustainable is sheep grazing when the government recommends that the UK population cut its meat consumption? Aren't there better alternatives to sheep grazing such as designing the solar arrays so that they harvest the sun while vegetables are grown in greenhouses underneath, as we are seeing in countries like Germany?
- How will the project affect local public footpaths and access routes during its operation?

### **Community & Consultation**

- Will there be a report that summarizes all the public comments from this phase and explains how you have responded to them?
- Will community feedback be considered by the Planning Inspectorate in the Scoping Opinion?
- How will you keep the community informed about the project's progress after this consultation?
- What are the benefits of this project for our local community?
- What provision will there be for in-kind benefits, such as dedicating part of the site to generating electricity for the properties in the community?
- If there is a vast majority of opposition from the community for this project, how will SSE respond?
- Beyond recording feedback, how will SSE demonstrate that specific community concerns raised during nonstatutory and statutory consultations have directly led to changes or refinements in the Scheme's design or mitigation plans?
- What specific mechanisms will be in place to ensure that "where possible and practicable concerns are addressed" through the consultation process, and how will the practicality of addressing concerns be determined?
- How will SSE ensure that the "Scoping Opinion" issued by the Planning Inspectorate is also based on consultee views and is fully integrated into the subsequent EIA stages and the ES?
- What opportunities will there be for local residents to provide ongoing feedback or raise concerns during the construction and operational phases of the project, beyond the formal Development Consent Order consultation periods?
- What happens if SSE sells the project on or contracts separate providers who have not engaged with the community?
- How will the feedback from both non-statutory and statutory consultations be systematically "recorded and documented" in the Consultation Report, and how will this feedback directly influence the final Development Consent Order application?

• The scheme is called an 'energy park'. Assuming that 'park' is defined as an area of land for public use with natural features that can be enjoyed for relaxation, recreation and enjoyment by the community, how does SSE propose to fulfil the definition of 'park' to ensure that the community can enjoy maximum benefit from the 'park'?

### **Heritage & Archaeology**

- Will there be continuous archaeological monitoring during all groundworks as required for all other developments in the areas?
- How will you protect the setting of the Eastbridge church ruins to the south of site 6?

### Landscape and Visual Impact Assessment (LVIA)

 How will you incorporate additional sensitive receptors or representative viewpoints that you may have not yet identified?

### Residential amenity assessment

Given the proximity of the solar and battery storage scheme to the residents of Newchurch village and the impact
of the scheme surrounding residences and businesses on Wills Lane as well as those bordering the red line
boundary, we request that Residential Amenity Assessments (including Residential Visual Amenity Assessments)
are undertaken for the most impacted properties in order in order to ensure that the scheme does not cause
unacceptable harm to the quality of life through overbearing structures, increased noise, reduced daylight and loss
of privacy.