**Primary grounds for objection**

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| --- | --- | --- |
| 1 | Water, flood risk and drainage | * For many centuries, systems of drainage ditches and watercourses have been used to retain the fertile land across the Romney Marsh. This is essential to the Marshes survival given that a large proportion of Romney Marsh is below sea level and would therefore be underwater for much of the time if it weren’t for the ongoing drainage and seawall defences. Watercourses across the Romney Marsh include rivers, streams, sluices, dykes, drains and ditches that provide passages for water to flow whilst not forming part of a main river. These watercourses form a dense network of drainage ditches and have ensured the ongoing management and retention of the Marsh
* Most of the larger ditches or sewers, have significant time depth and can be dated back to the earlier salt marshes. Smaller channels that are around 6-8 feet wide at bank level further form a network of minor drainage channels which connect to the main sewers of the Marsh.
* There is roughly 220 miles of watercourses across the Romney Marsh.
* A comprehensive reed cutting programme to allow for the maximum efficiency of water flow off the Marsh is undertaken and a de-silting programme also is used to maintain the current river capacity.
* In addition to the watercourses on the Marsh, several farms use a further land drainage method called mole drainage to ensure that their land is suitable for crop growing.
* Romney Marsh has an intricate system of drainage that has been developed over the years and includes well maintained dykes with hedgerows – all of which significantly reduces flooding across the area. Any changes to the existing dykes or hedgerows will cause significant concern (think of Somerset levels).
* The proposed development is in Romney Marsh, an area historically susceptible to flooding and requiring a complex drainage system. While current flood risk may be low, the long-term impact of the development on the existing drainage infrastructure and flood management in this unique landscape needs rigorous assessment.
* The open water network is a vital component of the marshes’ irrigation and drainage network
* The introduction of large areas of solar panels, even if permeable surfaces are maintained underneath, could alter natural water infiltration and runoff patterns, potentially increasing surface water runoff volumes and peak discharge rates, especially if ground cover is not well-maintained or if gravel is used.
* Concentrated runoff from the drip line of solar panels could increase the potential for soil erosion at the base of the panels, particularly if the ground beneath is bare, as the kinetic energy of this water can be significantly higher than rainfall.
* Concerns exist that the development may not adequately account for future flood risk scenarios, including the impacts of climate change on rainfall and sea levels, which are critical for a low-lying area like Romney Marsh.
* The Flood Risk Assessment (FRA) for the project must demonstrate that all flood-sensitive infrastructure is located outside high-risk zones or designed to remain operational during flood events, and that the development will not increase flood risk elsewhere.
* As this proposal could affect drainage on or around the site it should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal.
* Concerns about how solar panels might change water flow, increase runoff, or impact Romney Marsh's unique drainage system.
* Worries about future flood risks, climate change impacts on rainfall/sea levels, or if the project's flood assessment is strong enough.
* The watercourses and drainage ditches across the Romney Marsh are vulnerable to silting and so their ongoing maintenance is essential to maintaining the land of the Marsh. Excessive silting of ditches could lead to reduced capacity for water flow, the promotion of pollution of the ditch water and growth of aquatic weeds, algae and bio-organisms.

**Questions:**1. How will you ensure the quality and quantity of local water is not negatively impacted by this project?
2. How will the project affect local water sources (ditches, streams, ground water)?
3. 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 work effectively?
4. Are you going to do anything with the existing ditches and dykes?
5. How will you ensure that 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?
6. If the scheme leads to localised flooding affecting properties, how will the developers compensate affected properties?
7. Many properties have private water supply pipes that run parts of the land and roads proposed by this scheme. How will SSE protect private water supplies and if they are damaged, how will they ensure they are fixed at the cost of the development not at the cost of the residents?
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| 2 | Strategic use of land | * We object to the change of use of good, productive and fertile arable land (grade 1 & 2) being used for a “temporary” industrial use of 40+ years for the sake of generating relatively small amounts of intermittent and unpredictable energy, especially when England is ranked 229 (out of 230 countries) by the World Bank in 2020 in terms of average practical solar potential.
* The land around Newchurch has a large propensity to shrink and swell, plus it is very unstable. Not at all suitable to locate the kind of heavy infrastructure required for solar and BESS
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| 3 | Battery energy storage systems (BESS) impact and risk | * Concerns about the safety of new battery technology, especially regarding fire and toxic releases
* In 2024, the British Standards Institution (BSI) released new guidelines for BESS in residential settings, known as PAS 63100:2024. It states these guidelines aim to enhance safety and establish best practices for the installation and maintenance of BESS. It should be noted that these are merely “recommendations and do not form any legal/mandatory requirement”, therefore villages, like Newchurch, are at the mercy of the developers to ensure this system is built and managed in a robust way.
* Concerns about emergency response times (e.g. 15 minutes on country lanes but Ashford fire service is 20 minutes away), and local resources for large-scale incidents.
* 3 BESS fires in the UK alone YTD – Tilbury, Aberdeenshire, and Gloucestershire
* New stories about in recent months of BESS facilities catching fire – one such example being the Moss Landing BESS in California which caught fire in January 2025 and required 85 fire engines and 8 million gallons of water to contain the fire. It produced toxic vapours and dangerous chemicals which were found in the soil. Elevated levels of manganese, copper, and aluminium 5 were found in drinking water, posing risks to human health and ecosystems. That facility was 300MW, smaller than what is proposed in the Shepway Energy Park.

**Questions –** 1. Does 400 MW refer to the total battery power capability? If so, please provide energy storage capacity figures in MWh alongside the power capability.
2. 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?
3. How much energy will the batteries store generated by the solar array, and how long can they discharge energy for?
4. Why is there double the MW amount if installed battery capacity to installed solar capacity?
5. Will the batteries import/export energy from other sources?
6. 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?
7. What will be used to mount the battery storage units to sit above flood risk levels?
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| 4 | Food security | * The UK currently relies on imports for approximately 46% of its food, making us the world’s third-largest importer of food. Arable land in the UK is declining. Losing land such as that proposed at Shepway Energy Park land will worsen our reliance on imports at a time when resilience is critical.
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| 5 | Impact on landscape and visual amenity | * The proposed development will industrialise the tranquil rural character of the area, which is inappropriate for this setting.
* The solar panels and associated infrastructure will be prominently visible from across the region due to the flatness of the Marsh and lack of tall trees, thus significantly altering the existing views.
* The scale and height of the proposed solar panels (5 metres), which will make effective visual mitigation by planting difficult or impossible.
* The development is located within or near a valued landscape, such as the Kent Downs National Landscape, and will detract from its special character and purpose.
* How the development will industrialize the rural character of the area.
* Visibility of solar panels/infrastructure from your property, public footpaths, or roads, changing existing views.
* Difficulty or impossibility of effectively hiding the panels with planting due to their scale/height.
* Impact on valued landscapes like the Kent Downs National Landscape.
* Potential for glint/glare affecting homes, roads, or aircraft.
* The National Policy Planning Framework (NPPF) places a strong emphasis on the protection and enhancement of valued landscapes. Paragraph 109 states that the planning system should contribute to and enhance the natural environment by "protecting and enhancing valued landscapes". Romney Marsh, with its recognized "natural beauty" and "unique" character , clearly constitutes a valued landscape.
* Additionally, NPPF Paragraph 114 requires local planning authorities to "maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes". As a significant "coastal wetland" with an "extensive coastline" , Romney Marsh is directly subject to this policy. The proposed project, with its extensive solar arrays and associated infrastructure, will be highly visible across the flat, open landscape, irrevocably destroying its distinctive visual amenity and rural character.
* For renewable energy developments, NPPF Paragraph 97 requires that "adverse impacts... including cumulative landscape and visual impacts" are "addressed satisfactorily". Given the project's vast scale, spanning 1000 acres across six distinct areas, and the highly sensitive nature of Romney Marsh, it is highly questionable whether these impacts can be satisfactorily addressed or mitigated. The cumulative effect of multiple large industrial installations across this unique and open landscape could be devastating, leading to a fundamental and unacceptable change in its character.

**Questions:**1. What kind of fencing will be put around the site, and how tall will it be? How will it be screened? Will it be made wildlife friendly for ground-roaming mammals?
2. What will the height be of any security cameras or lights on tall poles? What direction will they face?
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| 6 | Loss of productive agricultural land and food security | * The project will result in the loss of high-grade agricultural land (Grade 1, 2, and 3a), which is contrary to national policy on protecting valuable farmland.   [National Policy Planning Framework 2024](https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf)
* Building on this agricultural land compromises the UK's food security and its ability to produce sufficient food for a growing population.
* Alternative locations for solar development, such as industrial land, rooftops, or car parks, should be prioritised over greenfield agricultural sites.
* Is Natural England being consulted? [Natural England guide to assessing development proposals on agricultural land](https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land)

**Questions:**1. 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?
2. 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? And who is responsible for this, are there monetary guarantees in place to ensure that financially this can happen?
3. How will the Framework Soil Management Plan specifically ensure that soil resources are protected from compaction, mixing, and loss of nutrients during construction and reinstatement, and what enforcement mechanisms will be in place?
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| 7 | Biodiversity and wildlife | * The development poses a risk to protected species, habitats, or ecological networks within or adjacent to the site.
* There is concern about the impact on local wildlife, including birds and insects, and the disruption of their habitats.
* The project may negatively affect soil health and natural plant growth beneath the panels due to reduced sunlight and potential compaction.
* Wildlife such as Marsh Frogs, Emperor Dragonflies, Kingfishers and Mute Swans thrive on the Marsh.
* The Water Vole, Marsh Mallow, Medicinal Leech, Greater Water Parsnip, and Great Crested Newt are all present on the Marsh and protected by law.
* The Marsh’s proximity to the Dungeness National Reserve also means that many rare species of migratory birds are recorded here and are attracted to the marshlands where they can feed and breed.
* Sympathetic management of the drainage ditches is important to preserve the valuable communities of wildlife that are found here as well as avoid detracting from the distinctive local landscape

**Questions:**1. How will you protect local wildlife and their habitats during and after construction?
2. How will the effectiveness of this be monitored through the construction and operational stages?
3. What steps will you take to improve biodiversity on the site compared to the current baseline, beyond just planted screens?
4. How will the scheme demonstrate achievement of a Biodiversity Net Gain greater than the minimum 10% required by the Environment Act 2021, and what specific metrics will be used for measurement?
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| 8 | Traffic and infrastructure | * The construction and maintenance phases will generate a significant increase in heavy vehicle traffic on narrow, unsuitable rural roads, leading to congestion and safety hazards for local residents, pedestrians, and cyclists.
* The existing local road infrastructure is not adequate to accommodate the anticipated volume and type of construction traffic

**Questions:**1. How are construction vehicles able to negotiate the narrow country lanes without major alterations to the landscape?
2. 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?
3. 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?
4. Where will the on-site water supply come from during construction?
5. 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?
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| 9 | Noise and vibration | * The operation of the Battery Energy Storage System (BESS) and associated equipment (inverters, cooling systems, transformers) will generate unacceptable noise levels, particularly impacting nearby residential properties.
* The rural setting has very low existing background noise levels, meaning any additional noise from the development will be highly noticeable and disruptive, especially at night.
* Concerns exist regarding specific noise characteristics, such as tonal, impulsive, or intermittent sounds, which can be particularly intrusive.
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| 10 | Cultural heritage  | * There is a risk of disturbing undiscovered archaeological remains during site preparation and construction.
* The drainage ditches, watercourses and sewers across the Marsh are a distinctive feature in the landscape and synonymous with the local character
* Romney Marsh holds a distinct and irreplaceable position within the cultural and natural heritage of the UK. The Folkestone & Hythe District Heritage Strategy (F&H DHS) unequivocally describes it as a "unique historic landscape that has evolved over thousands of years". This vast expanse is recognized as the "largest coastal wetland on the southern coast of England," celebrated for its inherent "natural beauty, diverse habitats and wildlife, rich heritage and extensive coastline". Significantly, the F&H DHS formally designates Romney Marsh as a "heritage asset of Outstanding Significance" within its thematic framework, specifically under Theme 1a: Landscape. A paramount characteristic highlighted by the strategy is the landscape's pervasive "openness and wildness," a quality that renders it "unique in the county".
* The extensive footprint of the proposed Shepway Energy Park, comprising industrial components such as solar panels and battery storage units, stand in stark contrast to the defining attributes of Romney Marsh as a "unique historic landscape" of "Outstanding Significance," characterized by its "openness and wildness" and "natural beauty" (from the FHDC Heritage Strategy Report 2018).
* This stark divergence suggests that the proposed development cannot be merely "mitigated" without fundamentally altering the very essence of what makes Romney Marsh a uniquely valued heritage landscape.
* The "inevitable impacts" acknowledged by SSE are, in this context, likely to be transformative and severe, rather than minor or easily reversible, given the profound intrusion into such a highly sensitive and cherished environment.

   The Shepway Energy Park proposal directly conflicts with several strategic objectives and priorities set out in the F&HD Heritage Strategy:* **Heritage Management:** The F&H DHS prioritizes "Sustaining and enhancing heritage assets" and "developing ways to manage and guide change". The proposed energy park represents a radical, non-reversible change that fundamentally fails to sustain or enhance the unique landscape of Romney Marsh. Instead, it is a form of development that the strategy should actively guide *against* in such a sensitive and significant area.
* **Place Shaping:** A key objective of the strategy is to use heritage to "inform development, regeneration, and place-making" , with a priority to "recognize and consider the district's heritage and its significance at the earliest stages of development". While SSE asserts it is in an early engagement phase , the fundamental nature and scale of the project, as currently conceived, appear to disregard the "Outstanding Significance" of Romney Marsh as a place. If approved, the project would *re-shape* the place in a manner antithetical to its established heritage character, rather than being informed by it.
* **Visitor Impact Management:** The F&H DHS explicitly stresses the importance of managing visitor numbers to fragile areas like Romney Marsh to maintain their "tranquility and special characteristics". The visual intrusion and industrialization of the landscape resulting from the proposed development will severely undermine the very tranquility and special characteristics that contribute to the visitor experience and the quality of life for local residents. This directly conflicts with the strategy's stated aim to "contribute to and enhance tourism and the visitor experience and the economy".

**Questions:**1. Will Public right of Ways (ProWs) within the site be maintained for public access during the construction and operation stages?
2. 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?
3. Will there be continuous archaeological monitoring during all groundworks as required for all other developments in the areas?
4. How will you protect the setting of the Eastbridge church ruins to the south of site 6?
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| 11 | Cumulative impact | * Considering that there are currently two NSIP proposals across the Marsh, and SSE’s boundary for cumulative impact is only 5 km (less than where the South Kent Energy Park will be located), it is perceived by residents to be an unacceptable cumulative impact on the landscape, visual amenity, and local infrastructure.
* There are 3 other, as yet unannounced solar/wind/nuclear projects on TEC Register for the Romney Marsh as well

**Questions:**1. Why was a zone of 5 km chosen?
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| 12 | Glint and glare | * There is a potential for glint and glare from the solar panels to cause nuisance or safety concerns for residents, road users, or aviation personnel from Lydd Airport.
* While solar panels are designed to absorb light, their inherent reflectivity in an open, flat landscape like Romney Marsh means that glint and glare are particularly pertinent issues.
* The characteristic "big skies" and expansive views of the Marsh amplify the potential for visual intrusion, making the assessment and mitigation of these effects crucial for any proposed energy park in the area
* The flat terrain and lack of significant visual obstructions (like hills or dense woodlands) mean that solar panels can be seen from much greater distances across the Marsh. This extends the potential range of glint and glare effects to a wider area and more receptors.
* The expansive open skies of Romney Marsh are a key characteristic. The introduction of large, reflective surfaces like solar panels can significantly alter this dominant visual element, especially when glint and glare are present, creating a contrasting and potentially jarring visual feature.
* Romney Marsh is often valued for its sense of remoteness and tranquillity. The flashes and continuous brightness from solar panels can undermine this character, introducing an artificial and often distracting element into a largely natural and agricultural landscape.

**Questions:**1. How will you identify sensitive receptors (residences) and what will you do to mitigate glint and glare to comply with legal requirements?
2. 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?
3. Will you provide site specific 3D glint/glare modelling for all affected properties?
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| 13 | Decommissioning risks | * This development poses significant risks to our community for generations, over a period of at least 40 years, until 2070.
* Currently, there is no enforceable mechanism to ensure SSE (or whoever they may sell this onto) remove the solar panels and infrastructure at the end of the project’s life. This raises serious concerns about who will bear the cost of decommissioning and restoring the land –potentially leaving the burden on local communities or taxpayers.

**Questions:*** + - 1. How do we guard against the risk of renewed planning permission or new alternative industrial development on what will now be an industrial site?
			2. 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?
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| 14 | Carbon footprint of manufacturing and installation, and Human Rights violations | * The UK government recently announced it will ben the use of solar panels by GB Energy that use slave/forced labour in the supply/manufacturing chain.

**Questions:**1. 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?
2. What is the carbon footprint for the entire project, from creation of panels through to decommissioning, and how can it be carbon neutral when the panels will need to be replaced at least once throughout the proposed 40 year life of the Shepway Energy Park?
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| 15 | Conflict with Folkestone & Hythe District Heritage Strategy (2018) | * The project fundamentally conflicts with the F&H DHS, particularly Theme 1a (Landscape), which designates Romney Marsh as a "heritage asset of Outstanding Significance". The proposal contradicts the strategy's core objectives for Heritage Management (sustaining and enhancing assets) and Place Shaping (using heritage to inform development). The industrial scale and character of the SSE development are incompatible with the "openness and wildness," "natural beauty," and distinctive heritage features (including medieval churches, wartime defenses, and agricultural patterns) that define Romney Marsh.
* Romney Marsh is an irreplaceable historic landscape. The proposed Shepway Energy Park would inflict irreversible and fundamental harm to its unique character, visual amenity, and the setting of its numerous heritage assets, both designated and undesignated. The loss of such a distinctive and ancient landscape cannot be mitigated or compensated for.
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| 16 | Unnecessary development | * In the Clean Power 2030 Action Plan from the UK Government website, it states that NESO's plans forecast the 600 MW for solar needed to connect to both the transmission and distribution networks for the South East of England by 2030.
* Between Cleve Hill (350 MW), Stone Street Solar (100 MW), Enviromena’s St Mary in the Marsh proposal (16 MW), Pondwood Solar Farm in Woodchurch (35 MW), Sellindge (50 MW), South Kent Energy Park (500 MW) and this proposal at 200 MW, there is over 1200 MW, double what is needed by 2030.
* This doesn’t reflect the many other projects being scoped throughout Kent.
* The government’s own targets are confusing – the 600 MW by 2030 which this project clearly falls out of and there isn’t a clear target for transmission based ground mounted solar for 2035 or 2050. On that basis this proposal should not even be in design or Scoping phase with the Planning Inspectorate until the government announces the Strategic Spatial Energy  Strategies  in late 2026 or the Regional Strategic Spatial Strategies in 2027-2028 following that.
* Therefore we question the actual need for this proposal.
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**Additional Questions:**

**Solar Panels –**

1. What will influence the choice of fixed tilt or single axis tracker solar structures for the solar array?
2. 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?
3. How much energy will the solar panels actually generate compared to their installed capacity given the extreme intermittency of sunlight in the UK?

**New substation –**

1. Why is a new substation needed when there is an existing one at Dungeness?
2. What will a new substation look like? How much land will it occupy and how tall will its equipment be?
3. When will the National Grid decide on the location, and will it go through national or local planning?
4. What happens if the National Grid substation doesn’t go ahead?

**Performance and enforcement –**

1. 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)?
2. 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?
3. How will the developer and operator be held accountable for all mitigation and enhancement measures if the targets are not attained?
4. 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 and safety –**

1. 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?
2. 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?

**Climate –**

* + - 1. Will you assess the risk of “island heating” – PV Heat Island Effect – for properties surrounded by the energy scheme?
			2. What mitigation will be put in place to protect neighbouring homes from microclimate changes?

**Local benefits –**

1. How many local jobs will be created during the construction phase?
2. How many permanent jobs will be created for local residents once the solar farm is operational?

**Compulsory purchase orders –**

1. Will SSE treat those properties that will be surrounded by the scheme as “sterilised” properties and thus seek CPOs at the DCO stage?

**Category 3 interests –**

1. Properties and businesses who will lose value, especially during construction phases, and those properties that have now lost value are now in effect “frozen” and unlikely to be able to attract buyers. How soon can these individuals and companies register as Category 3 interests to be listed in Part 2 of the Book of Reference?