Comments on planning application 25/0542/FH

Site address: Land Opp Marten Farm, St. Mary's Road, Romney Marsh, TN29 0BT

Proposal: Construction of a solar farm including solar photovoltaic panel arrays to generate electricity, with ancillary substations, inverters, perimeter stock fencing and gates, CCTV, lighting, access tracks, landscaping and other associated works.

The following are comments on the application from <u>Hands Off Our Marsh</u>, a Community Interest Company, established in early 2025 to oppose numerous solar projects being scoped and planned by energy developers on the unique rural agricultural landscape of Romney Marsh. Hands Off Our Marsh is a member of the Solar Alliance UK, an umbrella group of campaign groups opposing more than 150 solar schemes across the UK.

This submission has been prepared by **Amanda Farrant, Newchurch, TN29 0DT** Contact: **info@handsoffourmarsh.org**

STRATEGIC USE OF LAND

Hands Off Our Marsh does not oppose the need for a transition towards greater energy independence, including the integration of solar energy as a renewable energy source as part of the national mix. However, we object to the change of use of good productive and fertile arable land to an alleged 'temporary' industrial use for the next 40-60 years for the sake of generating relatively small amounts of a ragged (intermittent) and unpredictable source of energy. We believe that distributed/embedded solar energy on otherwise previously developed land or on unproductive commercial and domestic rooftops, for example, is a more effective and sustainable use of space to generate intermittent solar energy.

WHAT ARE OUR OBJECTIONS?

In summary our grounds for objection are:

- Non-compliance with FHDC policy NE3 in regards Local Landscape Area of Romney Marsh
- Non-compliance with Policy CC6 (landscape, visual amenity, agricultural land loss)
- · Cumulative harmful impact on Romney Marsh's landscape and economy
- Threat to national food security from increasing loss of productive arable land to investors, housing, energy, nature restoration, etc
- Lack of clear decommissioning plan and sustainability proof
- Unproven need for project within new NESO/CP2030 frameworks
- Issues with solar panel manufacturing and forced/slave labour

FHDC POLICY NE3

FHDC Policy NE3 states in regards to the Local Landscape Are of Romney Marsh:

'Proposals should protect or enhance the landscape character and functioning of Local Landscape Areas. The Council will not permit development proposals that are inconsistent with this objective, unless the need to secure economic and social wellbeing outweighs the need to protect the area's local landscape importance.'

This application neither secure's economic and social wellbeing nor protects the area's local landscape importance. While it may provide some employment to local hauliers for the construction period, there will be few employment opportunities over the 40 year lifespan of the operating period. More details should be provided by the applicant on actual local employment opportunities that the scheme offers during the 40 year period.

FHDC POLICY CC6

In reference to FHDC Places and Polices Local Plan 2020, Policy CC6 states:

The development of new solar farms, or the extension of existing solar farms, will only be acceptable where:

- 1. The proposal does not have an adverse impact on the landscape character or have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty, other sensitive local landscapes or heritage assets;
- 2. The proposal does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance;
- 3. Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area:
- 4. There are no adverse ecology impacts arising from the development;
- 5. A suitable landscaping and screening strategy is included with the application;
- 6. The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact;
- 7. The solar panels are removed when no longer operational;
- 8. The consideration of the need for and impact of, security measures such as lights and fencing, are included in the application;
- 9. The proposal clearly indicates the installed capacity (MW) of the proposed facility; and
- 10. The solar farm will not result in the loss of the best and most versatile agricultural land.

We urge the Planning department to ensure that the project meets ALL of the criteria satisfactorily.

Our key objections and areas of concern with regards to FHDC policy CC6 however are:

LANDSCAPE AREA

We believe that due to the flat landscape of Romney Marsh, the height that the solar panels require taking into account the 600mm extra elevation required for flood risk measures, this solar array will have an adverse impact on the special and local landscape and character areas of Romney Marsh. It will also be visible from upland areas such as Knoll Hill at Court at Street where the public has a wide birds-eye views across Romney Marsh. Any support for a project like this must also be balanced against landscape protection. With several 1000-1500 acre NSIP solar projects being currently scoped on Romney Marsh including 500MW at Old Romney and 400MW at Newchurch, (and which local authorities will have little power over to decide on planning outcomes based on current experiences of other local planning authorities around the country), the cumulative impact of 'solar sprawl' in this very unique rural character landscape could have a very negative impact on the area's economy, especially tourism, which is a major source of employment and income for many on Romney Marsh.

LOSS OF RESIDENTIAL AMENITY

We believe that glare on bright sunny days will be highly likely to cause a disturbance to some local residences as well as to Marsh residents and visitors driving around the road network that surrounds the scheme, despite claims in the application that it will not. Traffic from the construction process will also create a major disturbance for residences along the construction route. In north Kent, Cleve Hill Solar Park's heavy construction traffic has led to repeated burst water pipes and cracks in residential houses along the route through Graveney village, according to the local campaign group GREAT.

We note that traffic volume measurements were taken in January, outside the tourist season, so do not represent fully the potential increase in traffic on St Marys Road especially, but also along the route through New Romney high street which is often congested. Given the existing problems of potholes and damage to roadside verges, the volume of construction traffic proposed for at least 6 months of the year is likely to cause even greater damage and will be highly costly for the cash-strapped KCC in repairs.

DECOMMISSIONING

We note that no plans have been submitted for the decommissioning process, nor is there mention of what will happen when the solar panels need replacing, typically after 25-30 years. How and where will the solar panels be discarded without creating hazardous waste or requiring carbon-intensive recycling of component materials? What are the cost implications for the project and is this built into the financial viability of the project? What entity will undertake the decommissioning of the site? What infrastructure is likely to remain such as ancillary structures? How will the land be returned to its current arable cropping status, and who bears the cost of this? Is there a risk that the land could become contaminated with chemicals leeching from the panels and frames and other infrastructure into the soil and water courses? As far as we know, there are no examples where land use has changed from arable to solar energy generation use for 40+ years and then successfully been returned to its original arable use, especially on a Marsh landscape where water is never far from the surface. We believe that there needs to be more evidence provided of the viability of how this can be done as well as of the costs of it (financially, environmentally etc) before any decision is made.

INSTALLED CAPACITY

We note that applicant variously refers to 16MW and 24MW as the installed capacity in its application. We urge that the planning department seeks confirmation of what the max installed capacity will be and assurances that this would not increase if planning permission were granted.

We would also like to point out that in the UK, installed capacity is not a good indication of how much energy solar panels can actually generate due to poor irradiation levels in the UK and limited daylight hours for 6 months of the year. A recent report on Solar PV suitability by country by the World Bank ranked the UK second to last out of 240 countries. Professor David Rogers of the University of Oxford, in a recent presentation to MPs at Westminster, explained that abundant UK cloud cover, limited daylight in winter and lower sun irradiation than other countries significantly reduces the actual amount of energy that panels can generate in the UK compared to their peak potential (MWp), or installed/nameplate capacity. It is rare that a 400Watt solar panel in the UK would ever produce 400Watts of electricity even on the brightest day because the sun doesn't shine brightly enough all the time and we have periods of the day when it can't shine because it is night time. The sun very rarely shines in the UK enough to produce even close to a panel's maximum output. SolarQ academics explain it thus:

This is the problem of Intermittency that affects all types of renewable energy. The proportion or percentage of the total time that any electricity generator produces its nameplate (i.e. maximum) output is called the Load Factor and Load Factors are very important in the renewable energy debate. Solar panels (in the UK) have load factors of about 11%. On- and off-shore wind turbines have Load Factors of 26.6% and 39.2% respectively (and are not limited by daylight hours).

A Load Factor of 10% means that the device is working at its maximum possible output for the equivalent of 10% of the time, or 2.4 hours in each 24hr period. It does not mean it is working for only 2.4 hours a day and not at all for the other 21.6 hours a day. For example, it could be working at half its maximum capacity for 4.8 hours a day. From the point of view of the power output from the system - the total Watt hours generated per day - the result is exactly the same. And it is Watt hours that electricity supply companies are interested in because demand is also in Watt hours. When the Watts generated in any one hour of the day do not coincide with the demand in Watts from consumers for that same hour of the day, alternative sources of electricity must be provided.

A 16MWp solar scheme has installed capacity to generate 140,160 MWh/y but due to the amount of daylight and sunny days, it will in fact produce around 14,300 MWh/y. It would seem that a scheme of 16MWp will rarely, if ever, produce its installed amount of power and given the load factors of panels installed in the UK, it will only ever work at 16MWp 10-11% of the time, 4 times less efficient than offshore wind, for example. In winter, when we have very limited daylight hours, this makes for a very inefficient use of good arable land that might otherwise be planted with winter wheat or a ground cover crop, both of which sequester carbon. Also, when sunshine is plentiful, it is likely to be when there is less need for energy, as the latest **NESO summer outlook**

<u>2025 report</u> demonstrates. We are also seeing reports in the news that <u>scientists in the UK are looking into 'dimming the sun</u>' which would make solar panels even less effective and demonstrates the lack of strategic joined up policy at government level.

LOSS OF BMV LAND

Land use classification - an out-of-date system and metrics - Despite the photographic evidence provided in various reports in the submission of healthy wheat crops growing in the fields in question, we note that in the ALC report, these parcels of land have been graded as 3b, not as BMV land as **Natural England show on the various ALC maps** available. We have shared the applicant's ALC report with Professor Emeritus of the Rural Environment at Essex University, Michael Alder, for his scrutiny. While he indicated that the results of the report largely cannot be challenged, he also indicated that this is because it is using an outdated system and metrics for detailed classification of land that are not fit for purpose, and which make it very easy for BMV land to be downgraded:

'The ALC maps showed the soil to be grade 2 but the detailed ALC has downgraded the site to 3b, hence non BMV. The soil has been put in wetness grade 4 and the figures show this correct even if it is a marginal decision. The meteorological data used is from 1988 and so it out of date but is the best available. The photos of the wheat crop look good. So we have another example of good land being lost as a result of a useless grading system.'

While developers are encouraged to avoid using better quality land for energy infrastructure projects (according to the NPPF and other guidelines), Professor David Rogers of the University of Oxford and a founding academic of SolarQ has found that:

SolarQ's analysis revealed that solar installations appear to be avoiding the worst quality land... and are using proportionately more of ALC Grades 1 to 3 land.

We are surprised that there is 'conveniently' no evidence provided in ground-mounted solar scheme planning applications to show how much food productivity will be lost or gained through the change of use, temporary or otherwise, (e.g. in terms of average wheat yield loss or average productivity gain depending on what agricultural use the land between the panels will have for the next 40 years). We realise this is because it is not required as evidence, demonstrating the major shortfalls of the current land use and change of use system.

As stated, it is clear from the photographs provided that the land is very fertile and produces healthy crops of wheat. Until a new Land Use Framework is introduced that addresses these issues, we would therefore urge the council to assess the actual productive quality of the land by either commissioning a report of satellite imagery of the land in question (which we understand can be provided for free to councils) or requesting 10 years of crop yield records for these fields from the landowner/farmer in order to compare these to averages for the different classifications of land between grade 1 - 3b, (instead of relying on a clearly inadequate system of detailed ALC calculation that can be gamed too easily).

FOOD SECURITY AND NATIONAL SECURITY

Given the finite amount of arable land in the UK, the pressures on land use changes and the growing volatility of global geopolitics, we believe that land that is currently producing crops should be protected for that use. Defra consistently states that Food Security is National Security. The UK already imports more than 40% of its food, a statistic that has been increasing over the decades. On our small island, with pressure on land to meet food, energy, housing, industry, and nature, biodiversity and forestry needs, our supply of arable crop land is rapidly diminishing, especially in parts of the country that boast the best and most versatile land such as Kent, Lincolnshire and Nottinghamshire. According to a government report, 37% of UK utilised agricultural area (UAA) is arable land. In recent years, before the rise of the supersize utility scale energy infrastructure projects, the total area of croppable land decreased by 5.4%. The area of uncropped arable land meanwhile increased by 98%.

According to Professor (Emiritus) of Rural Environment, Michael Alder, at the University of Essex:

The most worrying statistics relate to agricultural land loss. Average land loss to UK agriculture has been assessed at 40,000 hectares (96,000 acres) a year and rising. In reality, the figure could be a lot higher, with woodland targets set at 30,000 hectares a year, and infrastructure projects and housing expanding and increasing land usage. A study by the UK Centre of Ecology and Hydrology suggested a loss of two million acres between 1990 and 2025, and a study by the University of Cambridge 2014 suggested a land shortfall to farming of two million hectares (4.8 million acres) by 2030. Every projection shows that loss of productive land and new environmental schemes, while fundamentally a good thing, will reduce food productivity; the same applies to woodland areas. Land being used for energy purposes, e.g., the production of biofuels or for solar farms, will further reduce the foodgrowing areas. In 2021 bioenergy crops and solar farms accounted for a 3.3% loss of arable land. Future predictions are for a further 6.5% loss. This means that 445,000 acres are now not available for food production and could be compounded by a further loss of 900,000 acres. (Submission for the Inquiry into Land Use in England, 2022)

In addition, the Climate Change Committee (CCC) in the recent 7th Carbon Budget has recommended that livestock numbers are cut by 27% by 2040 and meat consumption is cut by 25% by 2040 and 35% by 2050 with a 40% cut for beef and lamb. The importance of our finite availability of cropped arable land in the UK cannot be overstated, especially with the population expected to grow to 78 million by 2050. It is vital for our future food security, and BMV land which makes up the majority of Romney Marsh agricultural land, due to its quality and versatility, is most able to adapt to changes in the climate, especially in an area that has been a well-managed floodplain since the 12th century allowing agriculture to thrive. While the contentious ALC 'metrics' allow these fields to be calculated as Grade 3b, we believe that the local council and local landowners should be protecting all land that is capable of producing quality, healthy food crops, especially cereals, not burying it under an industrial sprawl of solar panels. Once it has been paved over with solar panels and the associated infrastructure, we are stuck with it for at least 40 years. What happens if the geopolitical situation changes putting our food security at risk and we need that land for food production in 10 years time? This is not inconceivable in today's world.

Agrisolar use - is it actually sustainable? - We also note that the planning application stresses that the land will not be taken out of agricultural use. However, the land can undoubtedly only be used for sheep grazing, which it now seems could increasingly be discouraged if government policies aim to reduce livestock production and consumption in line with the CCC's recommendations (noted above), meaning it is not a sustainable choice of agricultural use. We also note that it seems to be up to the farmer whether the land is used for some form of agriculture or not, and there is no actual requirement. Academic experts of the organisation **SolarQ conclude**:

For the UK as a whole, and also for England alone, solar panels would need to cover an area about equivalent to all our current urban cover (this includes houses, roads etc.). Ground-mounted solar panels are currently being installed in the UK (at relatively low height above ground level) preclude agriculture from being carried out under them. Agrivoltaics, practised elsewhere, raise the panels several metres off the ground so that farm machinery can harvest crops beneath; but this requires much stronger and more robust staging to stop the panels toppling over in high winds. The introduction of sheep, ducks etc beneath solar panels in the UK is being called 'agri-voltaics', but hardly deserves this description. These animals are being used to keep the vegetation down around and beneath the panels (which would otherwise involve mowing or herbicides) and are therefore a necessity rather than a virtue.

<u>Soil compaction risks</u> - Soil compaction, in a study commissioned by the Welsh government in 2023, was <u>found to be a common problem on land used for ground-mounted solar plants</u>, which is likely to make returning the land to arable cropping very difficult and costly in the future.

ADDITIONAL CONCERNS AND OBJECTIONS

Community Fund and compensation

We understand that at a presentation given to Newchurch Parish Council a community fund of around £32,000 was proposed for Newchurch PC and St Mary in the Marsh PC. We see no mention of this in the applicant's submissions.

NESO reforms - Is this project really needed?

NESO and DESNZ's recent announcements on reforming grid connections points to prioritisation of 'ready' and 'needed' projects. We are conscious of the applicant's timing of this proposal to demonstrate 'readiness' before NESO reorders the queue in Q2 of 2025, but we believe it is important before the Planning department makes any decisions on this project that the status of the project in regards to NESO's reforms, especially the Gate 1 and Gate 2 methodology, is properly understood and confirmed.

The Environmena application states in point 9.7 of the Planning, Design and Access statement that, local government's 'failure to identify areas for renewables is tantamount to failing to allocate sites for housing, meaning that developers must find their own sites and therefore it will be necessary for speculative schemes to come forward to meet need'. We believe this is just that... speculative. In fact, FHDC council have already allocated land for solar schemes such as the similar size solar plant for Otterpool Park which will directly benefit this area, unlike schemes such as St Mary In the Marsh which have little benefits for the local population other than the landowner who will receive at least 4 x the normal lease value for such agricultural land.

We also contest the notion of 'need' particularly when considering this project against the scale of global climate change (which has no boundaries) and the UK's realistic ability (less than 1%) to impact global temperature increases as global emissions continue to rise.

We also contest the notion of 'need' when looking at the bigger picture of speculative projects nationally and across the South East region. According to National Grid, there are more than 5 times the number of energy projects in the pipeline than actually needed. According to UK Power Network's Embedded Capacity Register (the DNO's list of energy schemes that are either connected to the grid or have a connection agreement for future connection to the distribution network), we estimate there are already around 60 speculative solar schemes across Kent, East Sussex and Surrey, but mostly in Kent, with connection agreements with UKPN's South East Power Network and sitting in the DNO 'connection queue' potentially waiting for vital grid reinforcement works before they can be safely connected.">South East Power Network and sitting in the DNO 'connection queue' potentially waiting for vital grid reinforcement works before they can be safely connected.

If all these schemes were to go ahead, it would amount to around approx **3600MWp** installed capacity for the distribution network which would clearly put the network under strain. This is among nearly **18GW of combined transmission and distribution solar capacity sitting in the connection queue for the south east region**, more than **10GW over the amount that the government seems to say is needed in the south east region by 2035**.

The majority of the projects in UKPN's Embedded Capacity Register have Target Energisation Dates between 2030 and 2037. The St Mary in the Marsh project is one of the speculative schemes waiting in this 'queue' and is documented to have an energisation date of 2036, beyond the 2035 target year of CP2030. This undermines the claim that this relatively small solar scheme is 'needed' for energy security or decarbonisation. However, we appreciate that NESO are reforming the queue and new energisation dates may be published in the coming months.

We believe currently there is no evidence that this St Mary in the Marsh project will contribute meaningfully to national grid goals or securing a timely connection according to Clean Power

2030. We ask that the Council Planning department do not make a decision on this project until it is clear that:

- The developer can prove their project is one of the few actually 'needed' in the south east region under CP2030 targets and timelines
- NESO, DESNZ and UKPN have also clarified which solar schemes in UKPN's Embedded Capacity Register (alongside those in the NESO TEC Register) are both 'ready' and 'needed' according to the new Gate 2 methodology, and what reinforcement works are needed to allow the scheme to become operational before 2035 - and what would then be a realistic energisation date.

If the scheme cannot be connected into the grid until 2036, we question whether it is needed at all given the Clean Power 2030 and 2035 targets for the south east region. If planning permission is granted and the scheme is constructed, within what timescale will this take place?

CUMULATIVE IMPACT

We also request that the Council consider the need for this proposal alongside all the other solar plants that either:

- already exist in the region
- · have received planning approval, or
- are currently in planning or being scoped for the area (for local AND national planning level decisions).

As the Council will be aware, this project is one of many schemes in the pipeline for Romney Marsh. Indeed, in addition to the St Mary in the Marsh solar plant and the 500MW/1500 acre South Kent Energy Park around Old Romney, we note on **NESO's TEC Register** there are an additional 3-4 further schemes being scoped as NSIP projects around the Marsh, and in addition to the Stone Street Solar project currently going through the Planning Inspectorate NSIP process on the periphery of Romney Marsh. We also note an additional 1000 acres at Sellindge. And there are also plans for other smaller schemes under 50MW such as the Council's own planned Otterpool Park solar scheme and **Pondwood Solar Farm** near Woodchurch. We also understand through an FOI/EIR request to NGET, that the solar schemes will likely need a new 400kV substation somewhere on the Transmission line between Dungeness and Sellindge which would measure 500m x 500m, taking yet more valuable agricultural land out of production forever.

The St Mary in the Marsh solar scheme, while small in comparison with SKEP and Stone Street Solar Park, should be considered from a holistic perspective in terms of cumulative impact on the very unique character, heritage, economy and environment of Romney Marsh and the surrounding area. Thousands of acres of land covered with solar panels across different areas of the Marsh could start having a very large detrimental impact on wildlife, the recreation and tourist economy, residential and visual amenity, and the wider agricultural economy. Thus it should not be considered in isolation.

We believe that approving this scheme for planning sets a dangerous precedent for more productive arable land on Romney Marsh to be converted into solar energy plants for the next 4-6 decades, thus creating a dangerous cumulative effect on the character of Romney Marsh as an agriculturally productive powerhouse.

ETHICAL CONCERNS

The UK government has just announced it will ban the use of solar panels by GB Energy that use slave/forced labour in the supply/manufacturing chain. We urge the Council to ensure that all companies behind future ground-mounted solar schemes in the district also prove that they are using solar panels that can be proven to have no links to slave/forced labour in the supply of parts and manufacturing process.

BENEFITS vs HARMS
The planning application concludes:

In our opinion, under the dire circumstances that climate change undeniably presents, a temporary harm should be allowed for the greater gain.

The proposal implies that the weight of benefits, according to the applicant, outweigh the harms. We feel that the benefits are conveniently overstated to suit the investor's argument - as they seem to be in every proposal of this kind - and the full picture of 'harms' has not been addressed adequately, especially in terms of local cumulative impact on the character, economy and landscape of Romney Marsh, as well as the UK's shrinking cropped arable land area and future food security. We also feel that the impact of such a project on the human population has been unnecessarily downplayed.

We believe that the argument that this project will contribute to a greater gain despite the temporary harms is far overstated especially given the UK's ability to influence global carbon emission reductions and hence global temperatures. We contest that this solar scheme can make a significantly meaningful contribution to decarbonisation, especially when one considers the carbon footprint or **Total Life Cycle** cost of solar panels is 43gCO2e/kWh, three times that of wind turbines. For the estimated 35,084 panels needed for the scheme, it is equal to 1,508,612gCO@e/kWh. If the panels need to be replaced after 25 years, that doubles the total TLC cost figure.

We have to be realistic that however many utility-scale solar plants are introduced in the UK, the impact on global emissions and hence the impacts on climate change are negligible when much larger countries and populations such as China, the US, India and Indonesia are doing little to curb their carbon emissions. It is unrealistic for the applicant to claim that this scheme is needed to tackle the climate emergency at home because ultimately it will have negligible impact, because emissions in the atmosphere do not conform to national boundaries.

LONG-TERM SUSTAINABILITY AND FINANCIAL VIABILITY

Before making any decisions, we believe it is important that the planning department understands what is the financial status and viability of Environmena's project, and is it fully funded? It states in the proposal that it does not rely on subsidies. However, there is little detail on the financial viability of the project and how it proposes to deal with the costs of operating the scheme and managing biodiversity etc over the next 40 years. We see many projects pass through planning around the country by applicants that do not have the financial means in place to construct and implement projects and so they are sold on to other companies that do not always follow the conditions stipulated in planning. Kent's Cleve Hill Solar Park, now renamed Project Fortress by the new corporate owners, is one such example.

Where is the finance coming from? Does Enviromena have a Contract for Difference? Where will the electricity generated be sold on to via sleeving? Most solar panels have a 25-30 year lifespan. The area is in a flood risk zone. Can the developers and operators prove they can get insurance should there be problems with the solar scheme once its operational? Will the company be able to finance the replacement of the panels after 25-35 years and **inverters every 10 years**? What will be the process for removing them, recycling them, replacing them and then decommissioning the project after 40 years, or will in fact the 40 year schemes become 60 year schemes? What costs will be involved and who shoulders them? What will happen to the waste? What if new technologies make current solar technology unviable and outdated very quickly? We appreciate that we don't have a crystal ball, but technology is moving so fast and already we are starting to understand that over-reliance on intermittent energy generation technology that relies on the weather is highly risky and potentially expensive for consumers, and is not reducing our dependence on imports, especially in winter when we need electricity the most.

CONCLUSION

In conclusion, on the issue of land use, we believe that this approx 100 acre arable land at St Mary in the Marsh would be more effectively and efficiently used for arable production in order to contribute to national Food Security, leaving solar generation of this scale to be sited in more appropriate locations in the country such as grade 4 and 5 land, or on large warehouse and

factory roofs. We do not feel that the 'trade offs' cited are realistic trade-offs that will benefit the local environment and communities, or national climate policy objectives.

In relation to the claims of BNG gains and benefits, there are also other methods and schemes that the landowner could pursue to increase biodiversity of the land area without the need for a solar generation plant. The proposals for more hedgerows and trees and setting aside areas for key bird habitats etc could easily be achieved through improved land management of the existing agricultural land use.

Much is made in various planning documents about the need for community input into design and decision-making about their local areas. The current planning system for renewables, energy companies and landowners dictate generational changes to the rural environment to the exclusion of community needs and concerns. Where communities are consulted, it is generally a tick box exercise, as community campaigns like Hands Off Our Marsh are seeing up and down the country. There is widespread concern and opposition among residents at the scale and pace of solar scheme developments coming to our area with little coordination across local and national planning departments, processes and systems. We fear this could lead to rapid and inappropriate development of Romney Marsh that will destroy our unique and characterful landscape for several generations at least.