

Primary grounds for objection

1	Water, flood risk and drainage	<ul style="list-style-type: none"> 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 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. 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. <p>Questions:</p> <ol style="list-style-type: none"> Are you going to do anything with the existing ditches and dykes? 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 60 years of operation? If the scheme leads to localised flooding affecting properties, how will the developers compensate affected properties?
2	Strategic use of land	<ul style="list-style-type: none"> 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 60+ 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.
3	Battery energy storage systems (BESS) impact and risk	<ul style="list-style-type: none"> Concerns about emergency response times and local resources for large-scale incidents. <p>Questions –</p> <ol style="list-style-type: none"> The consultation document refers to having “secured an agreement with National Grid which would allow the import and export of up to 500 MW of electricity...this is some, not all of the generating capacity at this location...”. Is the 500 MW refer to the total battery power capability? If so, please provide energy storage capacity figures in MWh alongside the power capability. How much energy will the batteries store generated by the solar array, and how long can they discharge energy for? 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? What will be used to mount the battery storage units to sit above flood risk levels?

4	Impact on landscape and visual amenity	<ul style="list-style-type: none"> The proposed development will industrialise the tranquil rural character of the area, which is inappropriate for this setting. The scale and height of the proposed solar panels (up to 4.5 metres), may make effective visual mitigation by planting difficult or impossible. Difficulty or impossibility of effectively hiding the panels with planting due to their scale/height. Potential for glint/glare affecting homes, roads, or aircraft. Difficulty in creating adequate screening due to the soil and environment of the proposed site <p>Questions:</p> <ol style="list-style-type: none"> 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? What will the height be of any security cameras or lights on tall poles? What direction will they face?
5	Loss of productive agricultural land and food security	<p>Questions:</p> <ol style="list-style-type: none"> 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 60 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?
6	Biodiversity and wildlife	<ul style="list-style-type: none"> The development is near internationally protected wetlands designated under the RAMSAR Convention which support a wide range of migratory bird species and there is lack of research to indicate the impact of solar on this area (study should be conducted at Cleve Hill which had similar concerns looking at impact on breeding grounds, introduction of noise, light, and human disturbance into these sensitive habitats, and fragment ecological corridors critical to biodiversity) 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. <p>Questions:</p> <ol style="list-style-type: none"> 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 greater than the minimum 10% required by the Environment Act 2021, and what specific metrics will be used for measurement?

7	Noise and vibration	<ul style="list-style-type: none"> The rural setting has very low existing background noise levels, meaning any additional noise from the development, in particular the BESS, 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.
8	Cumulative impact	<ul style="list-style-type: none"> Considering that there are currently 3 NSIP proposals across the Marsh, it is perceived by residents to be an unacceptable cumulative impact on the landscape, visual amenity, and local infrastructure. There are 2 other, as yet unannounced solar/wind/nuclear projects on TEC Register for the Romney Marsh as well Given the 5200 acres currently under threat across 3 NSIP proposals, 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.
9	Glint and glare	<ul style="list-style-type: none"> 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
10	Carbon footprint of manufacturing and installation, and Human Rights violations	<ul style="list-style-type: none"> The UK government recently announced it will ban the use of solar panels by GB Energy that use slave/forced labour in the supply/manufacturing chain. <p>Questions:</p> <ol style="list-style-type: none"> How will EDF 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? 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 60 year life of the South Brooks Energy Park?
11	Risk to Romney Marsh Aquifer and drinking water supply	<ul style="list-style-type: none"> The proposed site lies in close proximity to the Romney Marsh aquifer which supplies drinking water to the region and is based in Lydd The inclusion of a large-scale Battery Energy Storage System (BESS) raises serious concerns about the risk of fire, explosion, and chemical contamination. In the event of a BESS failure, toxic substances could leach into the groundwater, posing a significant threat to public health and the local water supply.

Additional Questions:

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. 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?
3. Where will all the construction workers originate from, and where will they stay for the duration of the construction phase?

Compulsory purchase orders –

1. Will EDF 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?