

Mass-scale solar and BESS on Romney Marsh

Amanda Farrant, Hands Off Our Marsh, August 2025



Who is HOOM - Hands Off Our Marsh!?

Hands Off Our Marsh is a **community movement** set up to protect and conserve the unique, open, expansive and historically important countryside of Romney Marsh against mass energy industrialisation.

We aim to **support communities and residents** most affected by the huge numbers of proposed solar and battery storage schemes to achieve **the best outcomes** in the face of overwhelming change, harm and disruption that these projects are likely to cause.

We **support clean energy policy**, but we believe the UK's **current solar energy strategy poses a threat to food production and to the rural way of life** on Romney Marsh.

We are **non-political** and aim to engage with all political representatives and authorities at different levels of government.

We are a registered **Community Interest Company**.

We have over **1000+ members** in our Facebook group and **100s more supporters** who receive **our newsletter** and engage with us via email.

We are a **member of the UK Solar Alliance** and the **national Stop Oversized Solar campaign**.

HOOM's message:

Stop solar sprawl!



**Fields for food.
Rooftops for solar.**

Schemes in the pipeline for South Kent in the NESO Transmission Electricity Connection Register (TEC Register) + UKPN distribution connection register.

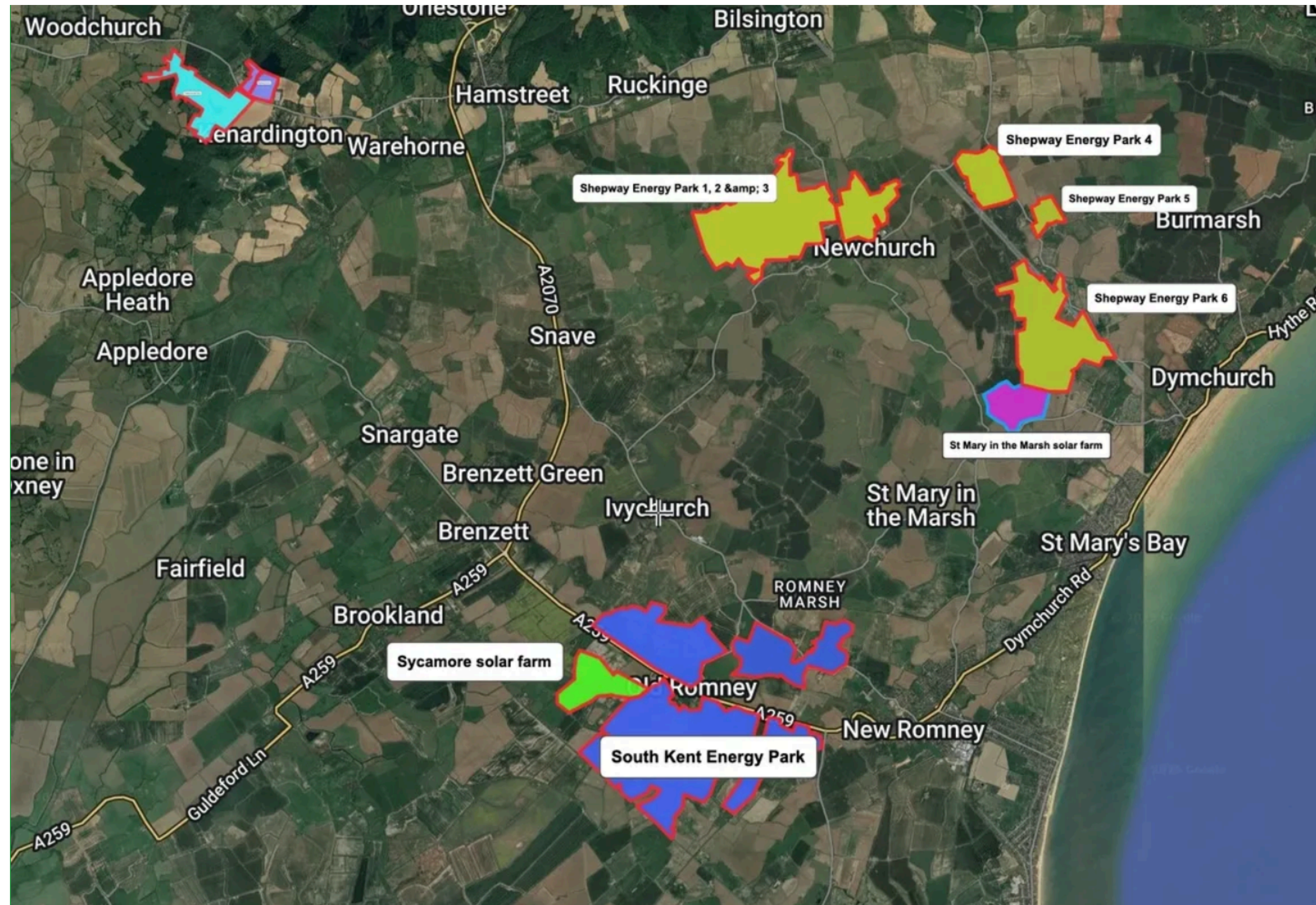
Project Name	Customer Name	Connection Site	NSIP or LPA	MW Connected	MW Increase / Decrease	Cumulative Total Capacity (MW)	MW Effective From	Project Status	Agreement Type	HOST TO	Plant Type
Lightsource Newchurch PV/ BESS	Lightsource Renewable UK Development Limited	East Kent connection node A 400kV Substation	NSIP	0	240	240	2037-10-31	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
Newchurch	SSE UTILITY SOLUTIONS LIMITED	Newchurch 400kV Substation	NSIP	0	400	400	2031-10-04	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
Newchurch High Impact Energy Hub	TELIS ENERGY UK LIMITED	Newchurch 400kV Substation	NSIP	0	1000	1000	2037-10-31	Scoping	Direct Connection	NGET	Energy Storage System;Nuclear;PV Array (Photo Voltaic/solar);Wind Onshore
Dungeness Energy Park	SOUTH KENT ENERGY PARK LIMITED	East Kent connection node A 400kV Substation	NSIP	0	500	500	2037-10-31	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
Dungeness Energy Park (Dungeness 400kV)	SOUTH KENT ENERGY PARK LIMITED	East Kent connection node A 400kV Substation	NSIP	0	500	500	2033-10-31	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
BLUE PLANET SOLAR	BLUE PLANET SOLAR LIMITED	Dungeness 400kV Substation	NSIP	0	500	500	2031-08-31	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
St Mary in the Marsh	Enviromena	Local Distribution network	LPA (FHDC)	0	16	16	2036-10-31	In planning		UKPN	Solar PV array
Pond Wood Solar Farm	Quintas Cleantech	Hamstreet 132kV substation	LPA (ABC)	0	35	35		In planning		UKPN	Solar PV array
Stone Street Green	Evolution Power Limited	Sellindge 400kV Substation	NSIP	0	99.99	99.99		DCO decision due 2025	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
Sellindge West	Sellindge West 10 Renewables Limited	East Kent connection node A 400kV Substation	NSIP	0	1000	1000	2033-10-31	Scoping	Direct Connection	NGET	Energy Storage System;PV Array (Photo Voltaic/solar)
GF SELLINDGE BESS	GF Sellindge Energy Ltd	East Kent connection node A 400kV Substation	NSIP	0	300	300	2036-10-31	Scoping	Direct Connection	NGET	Energy Storage System

Small-scale Solar Farms or BESS facilities vs Integrated Solar/BESS Plants (NSIPs)

Small-scale solar farms and BESS facilities under 50MW installed capacity are subject to Local Planning policies and processes guided by the **NPPF and Local Planning Policies**. (From December 2025 this increases to 100MW).

Mega-scale solar + BESS plants over 50MW (or 100MW from Dec 2025) are **NATIONALLY IMPORTANT INFRASTRUCTURE PROJECTS** and subject to planning via the Planning Inspectorate. They are guided by **National Policy Statements (NPS) EN-1 and EN-3, Clean Power 2030 and the upcoming Strategic Spatial Energy Plan**. The ultimate decision is made by the Secretary of State for Energy Security and Net Zero (DESNZ) who can override recommendations by the Planning Inspectors.

TO DATE...



Existing schemes

- Sycamore solar farm, Old Romney. 18MW installation, 120 acres, 82,000 panels (operating since 2015.). **Ave monthly generation = 10% of installed capacity (approx 1,378MWh from a possible 13,392MWh). (2015-2018 data)**

In Local planning - Distribution connections

- St Mary in the Marsh solar farm, St Mary's Road. 16MW, 100 acres, 35,000 panels (decision due 2025)
- Pondwood Solar Farm, Woodchurch. 35MW (decision due 2025)

NSIP Transmission connections

Planning Inspectorate - DCO post-examination stage

- Stone Street Green Solar, Aldington, 99.99MW (decision due soon)

Planning Inspectorate - Pre-application

- Shepway Energy Park, 200MW solar + 800MWh BESS

Early design stage - nothing submitted to PINS

- South Kent Energy Park, 500 MW solar/BESS

Relative sizes and scale in numbers

	Sycamore Farm	St Mary in the Marsh	Shepway Energy Park	South Kent Energy Park	Newchurch High Impact Energy Hub	Total from just 5 schemes
Acres	120	100	1000	1500	2000 - 3000	4720-5720
No of football pitches	68	59	570	840	1,140 - 1,700	2,677 - 3,237
No. of Ashford Designer Centres + car parks	4	3.33	33.3	50	66.6 - 100	157 - 190
No. of Hyde Parks	0.35	0.3	2.9	4.3	5.8 - 8.6	14 - 16
No. of average size family farms	0.55	0.46	4.6	9.9	9.2 - 19.8	25 - 35
No of Gatwick airports	0.07	0.06	0.6	0.9	1.2 - 1.8	2.3 - 2.9

‘Traditional’ solar farms vs New-breed, mega solar/BESS NSIPs

<i>Figures are approximate as each scheme differs</i>	<50MW	100 - 500MW
Max. solar panel height (without flood risk mitigation)	3m	5m
No. of solar panels (without flood risk mitigation)	<100,000	200,000 - 1.5 million
Max. BESS container height (without flood risk mitigation)	4.5m	4.5m
No. of BESS containers	10-20	100-500
On-site 132 kVSubstation	N/a	100m x 70m (7000 sq m)
New 400kV substation	N/a	500m x 500m (250,000 sq m)

Why are large-scale solar and BESS plants unsuitable for Romney Marsh farm land?

- Cumulative impact of removing grade 1 and 2 Best and Most Versatile (BMV) land from food production (on Romney Marsh and elsewhere) for an intermittent, low yield form of energy - “defies logic”
- Industrial destruction of unique character and heritage of Romney Marsh - cumulative impact of so many oversized solar/BESS plants will destroy visual, residential and visitor amenities
- Building ground-mounted electricity infrastructure on a highest risk flood zone area - new mass-scale industrial sprawl could increase ground instability, flood and drainage risks across the Marsh
- Unsuitability of rural roads and narrow lanes for lengthy construction phases + cost of damage to roads
- Danger to human life, nature and water courses from lithium ion battery fires - fires cannot be extinguished: high risk of toxic gas emissions and water contamination
- Impact on tourism, leisure and visitor numbers especially during lengthy 2-3 yr construction phases
- Harmful economic impact on communities + no benefits or compensation (while developers and landowners reap large gains)
- Harmful impact on wildlife and habitats, especially rare and sensitive species - can biodiversity really be restored and increased at this scale?
- New 400 kV substation proposed - yet existing grid and substation infrastructure at Dungeness remains unused - this is not cost-effective

Relevant district policies

FHDC Policy CC6 in FHDC's Places and Policies Local Plan specifically states:

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

*10. The **solar farm will not result in the loss of the best and most versatile agricultural land**.*

FHDC Policy HW3 regarding Development That Supports Healthy, Fulfilling and Active Lifestyles states:

*To increase, create and safeguard opportunities for healthy, fulfilling and active lifestyles and to **reduce the environmental impact of importing food**, development proposals should:*

*3. **Not result in the loss of the best and most versatile agricultural land** (Grades 1, 2 and 3a) unless there is a compelling and overriding planning reason to do so and mitigation is provided through the provision of productive landscapes on-site or in the locality.*

FHDC Heritage Strategy (2018), particularly Theme 1a (Landscape), which designates Romney Marsh as a "heritage asset of Outstanding Significance".

ABC's Heritage Strategy (2017) describes Romney Marsh as *"a heritage landscape of national significance"*.

The proposed Shepway Energy Park contradicts both strategies' core objectives for Heritage Management (sustaining and enhancing assets) and Place Shaping (using heritage to inform development).

ABC's Policy ENV3b relating to Landscape Character and Design in AONB's (ie the KDNL) states:

All proposals within or affecting the setting of AONB's will only be permitted in the following circumstances:

- The location, form, scale, materials and design would conserve and where appropriate enhance or restore the character of the landscape.*

Main reasons for opposing NSIP schemes - change in use of BMV land

BMV = Best and Most Versatile land = ALC grade 1, 2 and 3a

The 2025 UK Solar Roadmap states:

'The planning system considers the impacts of development on food production and planning policy and guidance for England is clear that wherever possible, developers should utilise brownfield, industrial, contaminated, or previously developed land. Where the development of agricultural land is shown to be necessary, lower-quality land should be preferred to higher-quality land. If a solar project proposes to use any best and most versatile agricultural land, developers are required to justify using such land and design their projects to avoid, mitigate and where necessary, compensate for any impacts.'

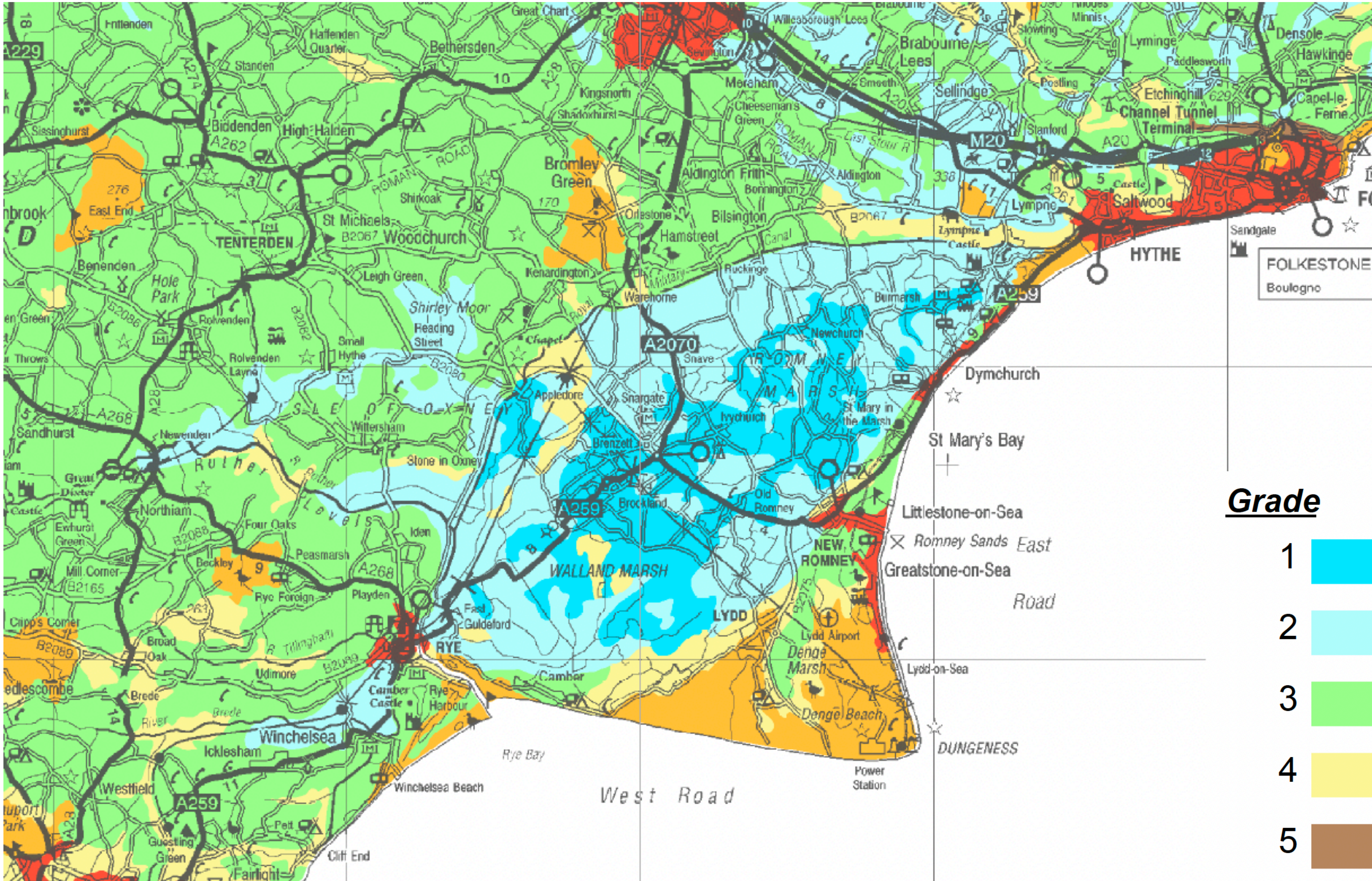
Other relevant policies: *NPPF; NPS EN-3; FHDC Places and Policies Local Plan - Policy CC6; FHDC Policy HW3 - Development That Supports Healthy, Fulfilling and Active Lifestyles*

Fact: The majority of Romney Marsh farm land is grade 1 and 2 - widely known as some of the most fertile in Kent, if not the country. (Natural England)

Fact: Grade 1 and 2 land is finite - Just under 20% of UK farm land is classed as grade 1 and 2, which is fast being displaced for housing, energy and nature restoration purposes (Defra)

Fact: 31% of large solar operational schemes to date are built on BMV land, according to research by CPRE, the countryside charity, while 59% are built on overall productive farm land (grade 3b). (Getting Solar Off the Ground, 2025)

Fact: the current UK solar pipeline stands at 131GW, almost double the government's 2035 target. If it is all approved, it would take up land equivalent to the size of Derbyshire (source: Stop Oversized Solar)



Grade

Description

1



Excellent

2



Very Good

3



Good to Moderate

4



Poor

5



Very Poor

Main reasons for opposing NSIP schemes - change in use of BMV land

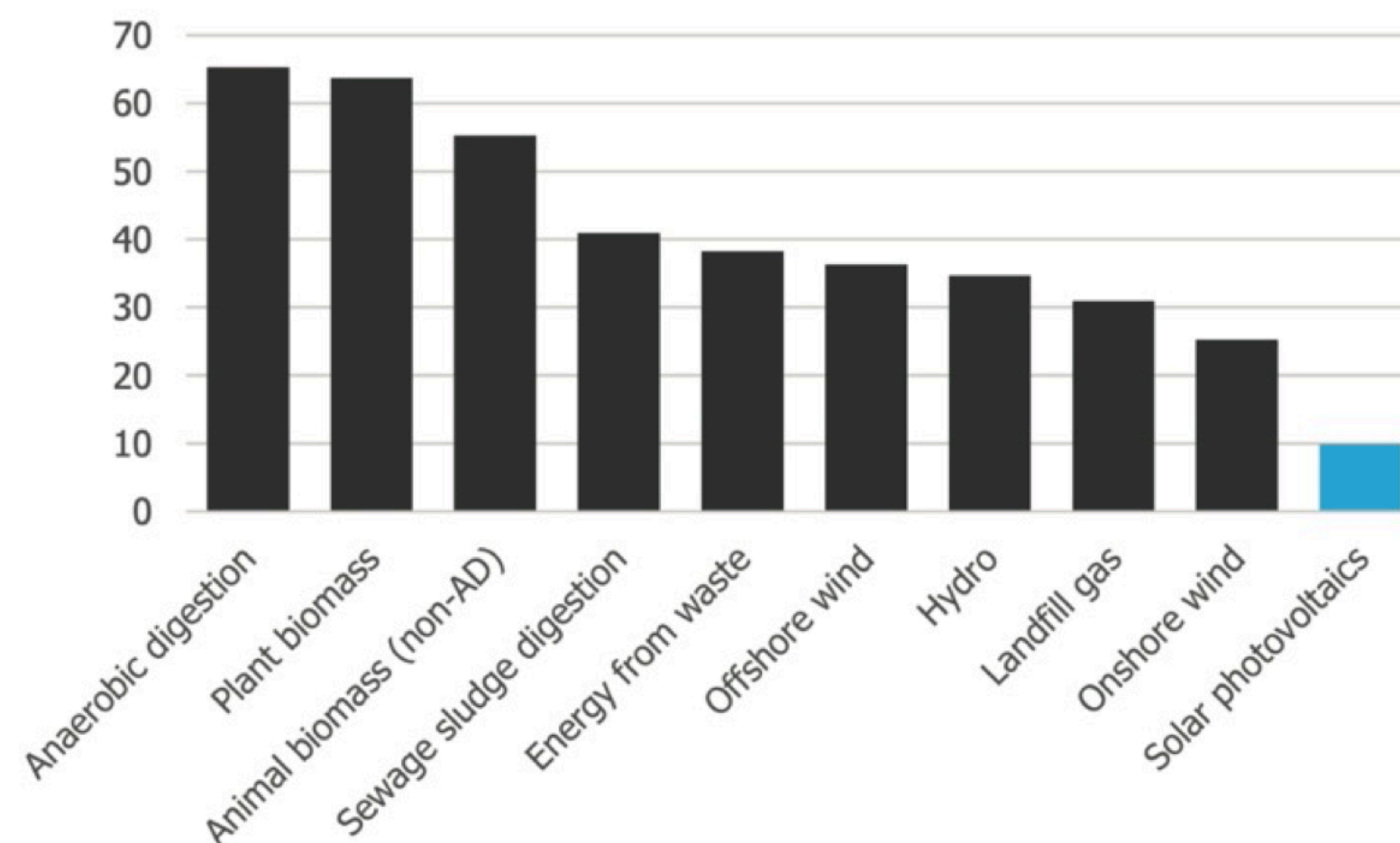
HOOM findings on BMV land:

- Most of Romney Marsh farm land is top grade 1 or 2 arable farm land. It grows high yields of **wheat, barley, potatoes, oil seed rape, mustard, beans, peas and flax**. The flat land is also used for turf production. It can achieve some of the **highest wheat yields in the country**, according to articles in the farming press. Land that has not yet been adapted to arable farming continues to be grazed by livestock, especially the famous Romney Marsh sheep.
- Almost **all the land proposed for these energy projects by the developers is grade 1 and 2 arable land**. None is used for sheep grazing as we understand. Where one developer commissioned a research consultancy to undertake soil testing, the results conveniently downgraded the soil from Grade 2 to Grade 3b - it thus fell out of the BMV classification for planning purposes.
- There is **little evidence that developers have sought any lower grade land** in the south Kent region first.
- While quite a few landowners on Romney Marsh have agreed to lease land for energy projects, many farmers - especially those who have farmed for many generations on the Marsh - have in fact rejected developers' approaches. It seems to be **mainly the larger landowners who have entered willingly into the lease option agreements**.
- Elsewhere in the country, particularly in Norfolk and Wales, **developers are starting to use the threat of Compulsory Acquisition under the 2008 Planning Act to secure land for solar arrays and cabling**, even before they have secured a Development Consent Order (Telegraph article, 31 July, 2025). We are concerned this could happen to farmers own the Marsh who have rejected developers' offers.

Solar is an intermittent and low yield energy source in the UK powered by subsidies

Professor Michael Jefferson, former Deputy Secretary-General, World Energy Council, and contributor to the Intergovernmental Panel on Climate Change Nobel Peace Prize, sets out why ground-mounted grid-scale solar is a ‘grossly ineffective’ source of electricity generation in the UK:

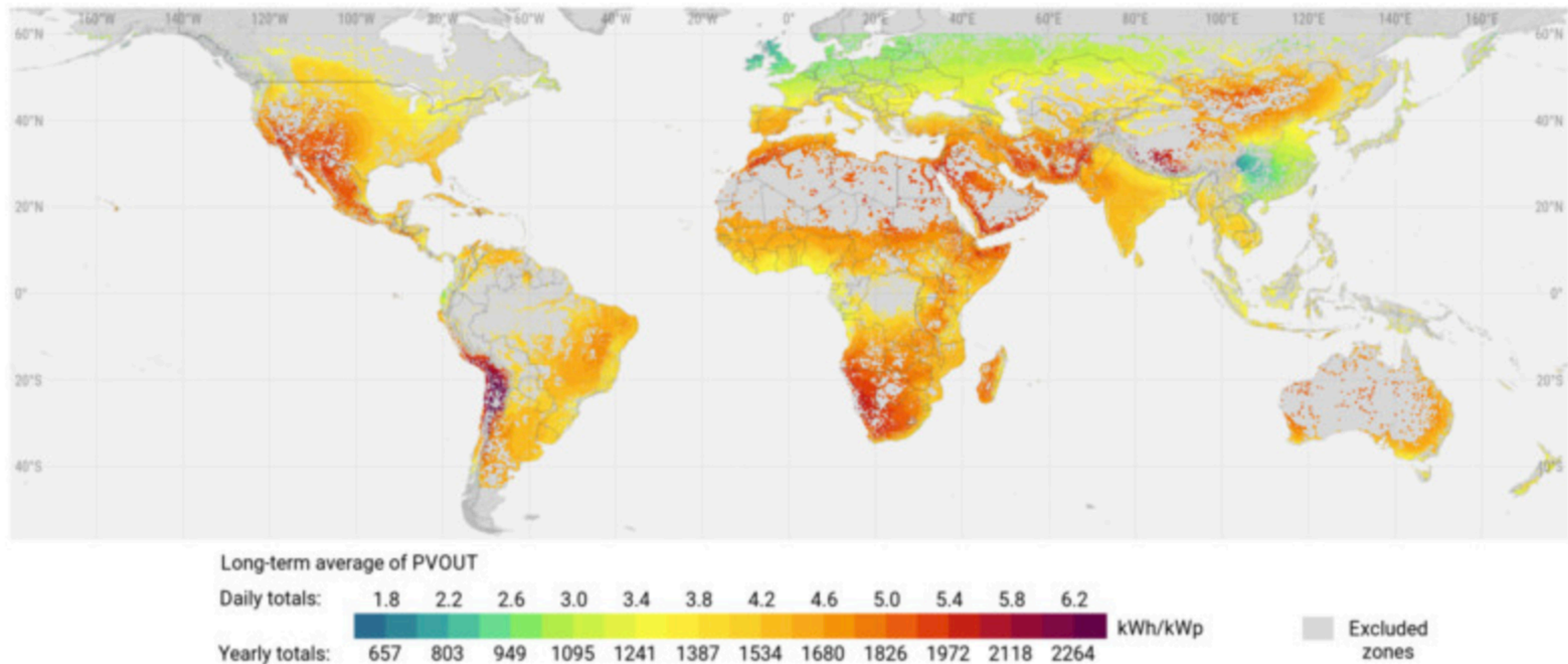
*“Our annual average PV output per installation is around half that of southern European countries like Spain. The **World Bank ranks the UK 229 out of 230 countries for solar power potential**. This is due to features we can’t change – surrounded by seas and frequently beneath clouds, the varying intensity of solar irradiance during the seasons of the year, and latitude, determining our fewer daylight hours. Across the year, the resultant solar power is **a grossly ineffective source of electricity generation for the UK. To place solar PV panels in grid-scale schemes on good agricultural land in a country that has to import about 40% of its food defies logic.**”*



For solar power in the UK, the difference between installed capacity and output is huge.

Solar panels produce 10-11% of their maximum possible output on average over the year.

Source: DESNZ Energy Trends: UK renewables – 2024 load factors (% of time energy generators work at capacity)



Practical photovoltaic power potential (PVOUT) at Level 1: Long-term yearly average of daily and yearly totals

World Bank / Global Solar Atlas, 2025

HOOM asks: Is this an efficient use of some of the most fertile food producing land?

“The reason why the UK is using fields not roofs is [because] our solar yield is too low to make it financially viable on roof tops, relative to fields.”

Off-the-record comment from a technical exec in the new build power sector

Former World Bank energy economist Professor Gordon Hughes outlines what really powers the UK solar market:

“The UK is a notably poor location for the large-scale development of solar power ... Solar power in Britain is entirely dependent on subsidies.”

“...fundamental to solar NSIPs in the UK is the availability of a large volume of dumb money, without which these projects would be wholly uneconomic.”

Solar NSIPs will not help to bring bills down for years due to the subsidies needed.

But embedded solar on domestic and commercial rooftops or car parks can directly reduce bills for electricity customers at the point of use.

Cumulative impact on food security

Across many of the biggest food producing counties in the UK, productive land is being taken out of agriculture for solar and BESS schemes.

Government sources and developers often claim that only around 0.1% of UK land is being used for solar generation. This accounts for all UK land, not farm land only. In **some of the biggest food producing counties, up to 2-3% of farm land has already been allocated, approved or proposed for solar schemes alone** (not counting other energy development, housing or nature restoration needs).

Fact: The UK already imports 40-55% of its food (depending on the source). The population is projected to grow to 73.7million by 2036. We have been losing on average 64,000 acres of agricultural land per year for the last two decades.

Fact: The government does not record what grade land is removed from agriculture for other purposes so does not know how much BMV land has been lost or is at risk, and what this means for food security.

Fact: Large amounts of farm land across the UK is being targeted for housing, energy, re-wilding, new woodland and forestry. Defra estimates a further 9% of farm land will be needed just for woodland and peatland restoration, and 8% for environmental management. 20% of farm land will be required for total land use change to meet all the government's environmental targets.

HOOM FINDINGS

Defra's Land Use Framework Consultation paper indicates that, while one fifth of farm land will need to change to other uses to meet environmental, housing and infrastructure targets, **productivity improvements in the remaining land will supposedly offset the loss of agricultural land**. Yet, UK agriculture already faces a **projected 15% drop in yields due to climate-related weather extremes**.

This underlines the **PARAMOUNT IMPORTANCE** of protecting our BMV land ie the **most adaptable and versatile land**, which we will depend on more than ever if we want to meet all UK climate, environmental and development goals.

We risk becoming **less food secure as a trade off for becoming more energy secure** at our peril. Given the unstable geopolitical situation in the world today, maintaining our BMV land to maintain domestic food production for worst case scenarios is vital for national security.

We must **keep in mind the food shortages during WW1 and WW2** when the UK was heavily reliant on food imports. Prior to the World Wars, the **UK imported 60-70% of our needs**. Merchant ships transporting food to the UK became a target for enemy submarine attacks. Poor weather and bad harvests also compounded the problem in some of the war years.

OTHER MAJOR QUESTIONS

- **How can the delicate centuries-old land drainage - designed for an agricultural environment not an industrial one** - be protected and maintained to prevent flooding and soil compaction, and ensure rainwater runoff does not overwhelm the system, especially if the labyrinth of pipes are buried beneath panels, concrete plinths and battery banks for 40 years?
- **Can the land ever be returned to its current prime quality** given all the infrastructure materials used in these schemes such as concrete, steel and silica? Who actually foots the bill? What happens if the land is contaminated? How will this be monitored?
- What will be the impact of destroying the unique landscape and heritage settings of Romney Marsh, even if it's only for 40 years? **How will it impact tourism as the major economy of the Marsh**, especially as agriculture is in decline?
- **Are the BESS in an accessible location?** Can KFRS reach a BESS fire from Ashford in time to prevent thermal runaway and toxic gas emissions? KFRS say they cannot put out a lithium ion battery fire, just cool other units to try to prevent the fire spreading. Will the vast amounts of water needed impact water availability for residents in the region?
- **How can we ensure developers commit to and act on providing community benefits** that affected communities actually want and need? And will they compensate residents for damage incurred to property during the construction phase?
- What will be the **impact of an inevitable decrease in property values in the area** as properties struggle to sell? There is also a very real **risk of compulsory acquisition of land and property for NSIP developments**. How can residents be adequately protected and/or compensated?
- **Roads across the Marsh will need upgrading and maintaining** to cope with years of construction traffic. Who will foot the bill?
- How will **developers be held to account for their Biodiversity Net Gain targets?** Who monitors this and who foots the bill?

What HOOM is advocating for...

Hands Off Our Marsh believes that **all BMV land should be protected in law against solar and BESS developments**, especially on flood-risk zone 3 areas like Romney Marsh.

HOOM supporters want to see **solar on brownfield and embedded on rooftops. Dungeness seriously considered for new SMR/AMR nuclear technology**. If solar schemes have to be considered, they should be proportionate to the limited agricultural land area of Romney Marsh and avoid using the internal rural road networks.

We believe that **BESS facilities need better regulatory standards** that all developers must adhere to, for example limiting their proximity to residential areas.

We want **guaranteed community, residential and business compensation** for those most detrimentally and/or financially disrupted or affected.

We want **community benefits that communities actually want and need**, that are managed by the community and its representatives.

We want **upfront transparency on who foots what bills**, for example: road upgrades, repairs and maintenance during and after construction; damage to property during construction; BNG monitoring and assessment; land contamination monitoring and assessment; fire service attendance in case of BESS fires; drainage upgrades, repairs and maintenance; new flood management measures across the Marsh resulting from large scale infrastructure projects; full decommissioning the schemes including returning the land to BMV land; improvements in sea defences to prevent the Marsh flooding from the inside (via the RMC) out

We also want **transparency around developers' compulsory acquisition and temporary acquisition plans** before the DCO application is submitted.