



The countryside charity  
Kent

## South Kent Energy Park

CPRE Kent is an independent charity that works closely alongside our national CPRE organisation. Formed in 1926, CPRE is a registered charity and one of the longest established and most respected environmental groups in England, with over 40,000 members and supporters living in our cities, towns, villages and the countryside.

CPRE Kent is the largest local branch of the Campaign to Protect Rural England. We represent 1,450 individual members, of which 173 are parish councils, local amenity groups and civic societies.

While we recognise the urgent need to transition to net zero, this must be with schemes that minimise landscape impacts, secure measurable nature recovery opportunities and enjoy the support of local communities.

It appears from the limited consultation materials published that there will be insurmountable difficulties in developing the proposed energy park project in such a sensitive location. As such, we object to the proposed development in principle.

We have set out below a (non-exhaustive) list of our key concerns in order that these can be addressed prior to formal submission.

1. Assurance is sought that full consideration will be given to whether there is a better, alternative site that would have less of an impact, particularly with regard to the environmental and landscape impacts.
2. Consideration should be given to the impact of the proposed development on footpaths that cross the site and are in the vicinity (including permissive footpaths), both as a physical resource and in terms of the impact on visual amenity for their users.
3. Heritage impacts – impact on listed buildings, conservation area and other heritage assets.
4. Loss of best and most versatile agricultural land.
5. We are also concerned about the likely impacts on the tranquillity of the rural and dark skies landscape, including both light and noise pollution. Artificial light at night has a detrimental impact on the health and wellbeing of both humans and wildlife. If lighting is not operationally required, it should not be provided. Likewise, sound (noise pollution) travels a long way across the Marsh.
6. In terms of ecology, we would expect to see biodiversity net gain, with a full understanding of the relationship of the site with the surrounding functionally linked land (associated with the designated Special Protection Area, Special

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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Registered charity (number 1092012), limited company registered in England (number 4335730)

Area Conservation and Ramsar sites), in terms of its habitats and the wildlife it supports, including its use as hunting grounds for birds of prey.

7. As an area characterised by waterways/drainage ditches, these should remain in place and not be diverted, or filled in. It will be essential that sufficient buffers are provided around the watercourses – which provide a habitat for water voles, amongst other species. These buffers should be at least eight metres wide to enable raptors/owls to continue to utilise these areas for hunting, nesting and resting. Water voles are one of Britain's fastest declining mammals and are widespread across the Marsh and are protected by the Wildlife and Countryside Act 1981.
8. We are concerned about the impacts on wildlife of any proposed culverts and access roads that will cross the site.
9. We would expect to see small mammal passes incorporated into any fencing within and around the site and for them to be fit for purpose.
10. We would also expect to see significant buffer zones around existing dwellinghouses as well as details of the design of the proposed perimeter fencing and screening.
11. Confirmation is awaited in terms of the routing of the proposed cabling between the proposed energy park and grid connection, as well as details of the proposed battery storage location and measures to deal with fire and toxic emissions.
12. With regard to construction traffic, we would like see confirmation of the routing of the proposed access and underline the need for construction vehicles to be escorted on/off site in convoy.
13. Confirmation is awaited of the nature of proposed community benefits.

We await further details of your project and expect to comment further when these are available.

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