

South Kent Energy Park EIA Scoping – CPRE Kent Response

Date: 19 June 2026

Application reference: FHDC ref: 26/0921/FH; Planning Inspectorate ref: EN0110035

Site address: South Kent Energy Park

Proposal: EIA Scoping Report for South Kent Energy Park: Consultation request in respect of EIA Scoping Opinion

We are CPRE Kent, the countryside charity. Founded in 1926, CPRE is one of the country's longest established and most respected environmental charities. CPRE Kent is the largest of the CPRE county branches. We represent 1,061 individual members across the county, together with 131 parish councils.

Our vision is of a beautiful and thriving countryside that enriches all our lives and is valued by everyone. Our mission is to promote, enhance and protect that countryside.

CPRE Kent strongly supports the transition to net zero. However, we do not accept that this justifies the piecemeal consenting of very large solar schemes in the countryside before there is a clear strategic plan for where such development should go and how cumulative impacts will be managed. Romney Marsh and Dungeness are already facing an exceptional concentration of NSIP-scale energy proposals. On this basis, it is CPRE Kents strong view that this scheme should not be being progressed further at this time.

In specific response to this EIA Scoping Report, we will strongly object to any narrowing of the scope of the Environmental Statement. We therefore ask Folkestone and Hythe District Council to ensure that the matters outlined in this representation are fully reflected in its scoping response to the Planning Inspectorate.

We make the following detailed observations which we will strongly encourage FHDC to reflect within their response to the this scoping request:

1. Planning and Infrastructure Act 2025 and adequacy of pre-application consultation

The applicant's Programme Document confirm that they will be looking to rely on the Planning and Infrastructure Act 2025 reforms that are scheduled to be in force shortly and therefore before the DCO application is submitted. It also acknowledges that, once those reforms apply, there will no longer be a statutory requirement for full statutory consultation or a Preliminary Environmental Information Report. For a scheme of this scale, complexity and local sensitivity, CPRE Kent considers that this would be unacceptable if it resulted in a weaker, less transparent or less accessible pre-application process.

FHDC should therefore ask PINS and the applicant to confirm that the community, parish councils, affected landowners, statutory bodies and relevant interest groups will still receive consultation equivalent in substance

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to the present statutory process, including meaningful preliminary environmental information and enough time to respond.

Without that commitment, there is a real risk that the EIA and DCO application will be prepared without adequate local testing of landscape, heritage, ecology, flood risk, traffic, BESS safety and cumulative effects. CPRE Kent asks FHDC to state that the scoping process cannot be relied on as a substitute for later comprehensive public consultation.

2. Need, alternatives, site selection and grid connection uncertainty

The ES should include a robust assessment of reasonable alternatives, including alternative sites, layouts, scales, technologies, grid connection options, substation locations and ways of avoiding the most sensitive land. This cannot be limited to a retrospective explanation of why the applicant's preferred site is convenient (which is what CPRE Kent usually sees).

The scoping material records that the precise location of the East Kent Connection Node A substation has not yet been confirmed and remains subject to National Grid's optioneering. That uncertainty is fundamental, because the substation, grid connection and associated infrastructure may materially affect the scale, location and environmental effects of the project.

CPRE Kent asks FHDC to require that alternatives and grid connection uncertainty are scoped in as central matters. If the substation location or connection strategy changes, the applicant should be required to undertake further environmental assessment and, where necessary, further consultation before submission.

3. Cumulative and in-combination effects, especially South Brooks

The ES must give extreme care to cumulative and in-combination effects with South Brooks Solar Farm, Shepway Energy Park, other solar and BESS schemes, electricity network infrastructure, substation works, transport projects and any relevant allocations or emerging proposals within the wider Romney Marsh and South Kent area.

Whilst we see that the scoping report's acknowledges South Brooks Solar Farm is within the search area, simply listing South Brooks is not enough. The ES must assess the combined landscape, heritage, ecological, agricultural, hydrological, transport, PRoW, construction and community effects of both projects together, including shared or sequential construction periods.

CPRE Kent finds it difficult to justify why South Kent Energy Park is needed alongside South Brooks where this proposal appears to require an entirely new substation. The cumulative assessment should therefore be linked to need, grid capacity and alternatives, not treated as a narrow technical exercise.

4. Landscape and visual effects

The project would introduce extensive solar arrays, substations, BESS infrastructure, fencing, CCTV, access tracks and lighting into a prominent and open rural landscape. The applicant's own Scoping Report identifies the site as lying within the low-lying Romney Marsh landscape, where openness, long-distance views, limited tree cover, drainage ditches and agricultural land uses are defining characteristics. The ES must therefore assess not only localised visual effects, but also the wider perception of industrialisation across Romney Marsh and the surrounding countryside.

The assessment should include agreed viewpoints, representative residential receptors, public rights of way, National Cycle Route users, roads, villages, elevated views from the Kent Downs and High Weald National Landscapes where relevant, night-time lighting, seasonal change, cumulative visual effects and the likely effectiveness and timescale of proposed landscape mitigation. Particular care should be given to close-range receptors at and around Old Romney, St Clement's Church, Midley Wall, Swamp Road, Dennes Lane, the A259 and the PRoW network crossing and adjoining the site.

The future ES should not assume that planting or biodiversity enhancement will neutralise landscape harm, especially in a flat and open landscape where mitigation may take many years to become effective and may itself alter local character. CPRE Kent asks FHDC to require clear photomontages, wirelines, cumulative viewpoints, night-time assessment and an assessment of both construction and operational effects over the full life of the development.

5. Cultural heritage, archaeology and historic landscape

The scoping material identifies clear heritage sensitivity within and around the DCO Site Boundary. This includes a Scheduled Monument within the Main Site, the Grade II abandoned medieval church and graveyard at the south-west corner of the Main Site, the Grade I Church of St Clement's at Old Romney, nearby Grade II listed buildings, recorded archaeological findspots within the site and Second World War military remains. The ES must therefore assess direct physical impacts, setting impacts, buried archaeology, historic landscape character and cumulative heritage effects.

This assessment should include scheduled monuments, listed buildings, historic churches, archaeological remains, former settlement patterns, field systems, military remains and the contribution made by openness, tranquillity, agricultural character and long views across Romney Marsh to the significance and experience of heritage assets. Particular care is needed because the proposed solar arrays, substations, BESS infrastructure, fencing, access tracks and construction works could affect both the fabric of archaeological remains and the way heritage assets are understood in their landscape setting.

CPRE Kent asks FHDC to resist any approach that treats heritage as a matter of asset buffers alone. The ES should include a clear heritage impact assessment, agreed methodology, field evaluation where necessary, assessment of cumulative heritage change and design changes to avoid or reduce harm. Screening, planting or offsetting should not be assumed to overcome harm to setting where openness and agricultural character form part of the asset's significance.

6. Ecology, biodiversity and Habitats Regulations Assessment matters

The ES must include a full assessment of ecology and biodiversity. The applicant's own Scoping Report confirms that further baseline survey work is still required, including updates to previous surveys during 2026 and 2027. It also identifies the need to assess designated sites, priority habitats, protected and notable species, biodiversity net gain and important ecological features.

This is particularly important given the site's sensitive Romney Marsh context. The Scoping Report identifies Dungeness, Romney Marsh and Rye Bay SPA, Ramsar and SSSI, Dungeness SAC, Romney Warren LNR, Dungeness NNR and a number of Local Wildlife Sites as matters to be scoped in. The assessment must therefore give particular care to birds, including non-breeding and farmland birds, functionally linked land, ditches and drains,

wetland habitats, hedgerows, invertebrates, aquatic ecology, reptiles, great crested newts, bats and other protected species.

CPRE Kent asks FHDC to require the ES, shadow HRA, EclA and biodiversity net gain material to be prepared on a consistent and complete evidence base before submission. The applicant should not scope out habitats, species or designated sites simply because they are not currently categorised as Important Ecological Features, or because embedded mitigation is assumed to be sufficient. Biodiversity net gain and habitat enhancement should not be used to mask avoidable harm, and any reliance on mitigation or long-term management must be secured, funded, monitored and enforceable for the lifetime of the project.

7. Water environment, flood risk, drainage and IDB matters

The ES must assess flood risk, surface water drainage, groundwater, water quality, ordinary watercourses, ditches, drainage channels, Internal Drainage Board infrastructure and the consequences of construction, operation and decommissioning in a low-lying marshland context.

Particular care is needed where solar arrays, tracks, substations, cabling, compounds and BESS infrastructure could alter runoff, access for maintenance, ditch function, flood storage, water quality or emergency response. This should include climate change allowances and cumulative drainage effects with other schemes.

CPRE Kent asks FHDC to require a robust flood risk assessment, drainage strategy, water quality assessment and clear engagement with the relevant drainage bodies. Matters should not be deferred to post-consent details where they go to the acceptability of the site or layout.

8. Agricultural land, soil resources and long-term soil health

The proposal would affect a very substantial area of agricultural land, including a significant amount of best and most versatile agricultural land. The applicant's own Scoping Report identifies 498.32 ha of Grade 1 land, 3.58 ha of Grade 2 land and 116.73 ha of Grade 3a land within the DCO Site Boundary. On that basis, around 618.63 ha, or approximately 71.78% of the DCO Site Boundary, is currently identified as potentially BMV agricultural land. This is not a marginal issue. It is one of the defining environmental constraints of the site.

The ES must therefore include detailed site-specific Agricultural Land Classification survey work, soil resource assessment, assessment of impacts on BMV land, impacts on farm holdings and the long-term consequences for soil structure, soil health and agricultural productivity. The assessment should address construction compaction, trafficking, trenching, cable routes, access tracks, substation and BESS infrastructure, shading, changes to vegetation, drainage, soil carbon, reversibility and the practical ability to restore the land to productive agricultural use after decommissioning.

CPRE Kent is particularly concerned that the applicant appears to rely on assumptions that the development will not result in long-term soil degradation and may improve soil structure and carbon sequestration over the operational life of the scheme, while also acknowledging that land management under and around the panels has not yet been confirmed. Those assumptions must be tested through evidence, not simply asserted. Operational effects on BMV land and soil resources should not be scoped out unless the applicant can demonstrate, through robust site-specific evidence, that significant effects are unlikely.

CPRE Kent asks FHDC to require this topic to be scoped in fully. The applicant should not rely on generic claims that solar development is temporary or reversible without a secured soil management, monitoring and re

9. Public rights of way and transport impact.

The ES must assess effects on public rights of way, recreational amenity, rural lanes, non-motorised users, severance, construction traffic, abnormal loads, road safety, access, driver delay and the experience of residents and visitors moving through the countryside.

Construction effects may be particularly important because of the scale of the site, the need for substations, compounds, cabling and BESS infrastructure, and the potential for cumulative construction with South Brooks and other nearby developments.

CPRE Kent asks FHDC to require a full transport and access assessment, including PRoW user experience, amenity, fear and intimidation, temporary closures or diversions, construction routing, construction timing and cumulative traffic effects.

10. BESS safety, fire risk and major accidents

The BESS assessment should be based on a realistic worst case for the size, chemistry, layout and location of battery infrastructure. It should also consider cumulative risk where multiple BESS or grid infrastructure projects may be present in the same area.

CPRE Kent asks FHDC to require engagement with Kent Fire and Rescue Service, the Environment Agency, drainage bodies and relevant safety consultees at the pre-application stage, with key safety principles settled before submission rather than left to requirements.

11. Glint and glare, noise, vibration, EMF, health and residential amenity

The ES must assess glint and glare, operational noise, construction noise and vibration, electromagnetic fields, residential amenity and health effects. These topics should be considered for residents, road users, PRoW users, equestrian users, aviation where relevant and sensitive community facilities.

The assessment should use worst-case design parameters, include inverters, transformers, substations, BESS cooling, night-time conditions, construction activities and cumulative operational noise from nearby energy infrastructure.

CPRE Kent asks FHDC to ensure these matters are not prematurely scoped out. Where the applicant considers effects to be insignificant, that conclusion should be justified by transparent modelling, receptor plans and sensitivity testing.

12. Decommissioning, reversibility and restoration

The ES must assess decommissioning as a real phase of development. This includes removal of panels, batteries, substations, foundations, cabling where appropriate, fencing, tracks, compounds and restoration of soils, drainage and agricultural use.

The applicant should identify the expected operational life, replacement cycles, waste routes, battery and panel disposal or recycling, restoration standards, funding mechanism and long-term management responsibilities.

CPRE Kent asks FHDC to require a clear decommissioning and restoration strategy at application stage. It should not be assumed that the development is acceptable because it is described as temporary unless the practical and financial means of restoration are secured.

13. Socio-economic and community impacts

The ES should assess socio-economic and community effects, including impacts on local identity, rural businesses, farming, tourism, recreation, community cohesion, construction disturbance and the perception of cumulative change across Romney Marsh.

A narrow assessment of jobs or business rates would not be sufficient. For local communities, the key issue may be the combined effect of multiple large energy schemes on place, landscape, access, tranquillity and confidence in the planning process.

CPRE Kent asks FHDC to require a proportionate but meaningful socio-economic and community assessment, informed by genuine consultation and clear recording of how local comments have shaped the scheme.

Conclusion

CPRE Kent asks Folkestone and Hythe District Council to include these comments within its response to the Planning Inspectorate and, if possible, to append this representation to the Council's scoping response. CPRE Kent objects to any narrowing of the EIA scope and considers that the matters identified above must be scoped in and assessed robustly in the Environmental Statement.

Most importantly, CPRE Kent asks FHDC to require a clear commitment from the applicant that the project will be subject to full, meaningful and accessible pre-application consultation, equivalent in substance to the current statutory process, regardless of any transitional arrangements under the Planning and Infrastructure Act 2025. For a proposal of this scale, public participation is not a procedural extra; it is necessary to properly test the scheme, its alternatives and its cumulative effects.

CPRE Kent reserves the right to comment further during pre-application consultation, if undertaken, and at any later DCO stage.