South Kent Energy Park consultation design – CPRE Kent response.

Thank you for inviting further comments. Please record this letter and our enclosed EIA scoping response to Folkestone and Hythe District Council, dated 19 June 2026, as CPRE Kent's response. That representation remains our detailed position. The points below highlight what must now shape the design.

CPRE Kent supports renewable energy and a roof-first approach to solar. However, we object in principle to South Kent Energy Park at this location and scale. The loss of high-quality farmland, harm to Romney Marsh's historic landscape and combined impacts with other energy schemes make this proposal unacceptable. These concerns cannot be resolved through detailed design or mitigation alone.

This position is reinforced by CPRE's national campaign calling for a temporary pause on new approvals for ground-mounted solar farms of 30 MW or more until a countryside-friendly Strategic Spatial Energy Plan is in place.

Grid uncertainty and strategic planning

Finalising a design before the grid infrastructure has even been decided is clearly premature. In this respect, we note that the PINS Scoping Opinion records an existing connection offer, but the location of the proposed East Kent Connection Node A substation remains unresolved. PINS has assumed it would lie within the scheme boundary and requires the assessment scope to be reviewed if it lies outside it. However, a connection offer does not resolve where the infrastructure will go or its full effects.

As such, it is our strong view that the applicant must wait until the Strategic Spatial Energy Plan is in place and the grid connection infrastructure is confirmed before finalising the design or submitting a DCO application. Consultation on the draft plan is expected in early 2027, with the final plan due by the end of 2027. We also seek a coordinated Romney Marsh energy infrastructure assessment covering South Brooks, Shepway Energy Park and associated grid works. This is because whilst the national plan will provide strategic context, it will not select individual sites or replace that local assessment.

Best and most versatile agricultural land

Our EIA scoping response highlights the exceptional extent of BMV land affected, much of it Grade 1. CPRE Kent considers that taking so much high-quality farmland out of food production cannot be justified without demonstrating why less harmful alternatives cannot be used. The location of a new substation has not even been confirmed yet. General claims about temporary use, grazing or soil improvement do not justify choosing this location.

PINS reinforces the need for a full assessment of reasonable alternative sites and layouts, expressly because of the extent of BMV land. It also requires justification by land grade and detailed ALC surveys. The January–February material should show how avoiding the best land has changed the scheme's location, scale and layout, rather than merely describing the preferred site.

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The refusal of Botley West on 10 November 2026 reinforces this point. The Secretary of State found that the applicant had not justified its use of BMV land or shown how it had sought to avoid and minimise that use. Conservation grazing would not mitigate the loss of arable production. The decision also records cumulative BMV loss alongside other plans and projects. These failings, alongside inadequate restoration commitments, led to substantial negative weight for geology and land use South Kent must show how land quality has genuinely influenced site selection and design, including the arrays and substation.

Heritage and the open marsh landscape

The historic landscape and the settings of its churches are also fundamental constraints. PINS requires consideration of long views and wider setting effects. Historic England's response explains how the churches' individual and collective settings contribute to their significance. This strengthens our concern that buffers and screening alone cannot resolve the harm.

The design must respond to the significance of St Clement's, the church ruins, historic drainage features and the wider marsh landscape. Heritage-led exclusions and substantial reductions in development should be tested. PINS also identifies that the visibility work omitted the tallest infrastructure. The consultation must show realistic views of the whole scheme, including substations and batteries, in summer and winter.

Botley West again also shows that less than substantial heritage harm can still weigh substantially against consent. The Secretary of State found that the contribution of setting to several listed churches had been underestimated, and that temporary or reversible development would still cause harm during its operational life. Romney Marsh must be assessed on its own significance, including the contribution of open farmland, long views and the relationships between its historic churches. Narrow buffers around individual assets are not a substitute for that assessment.

Combined effects and deliverable mitigation

The concerns informing our work on South Brooks apply here too. Fragmented layouts can spread disturbance through cable routes, access works and separate infrastructure compounds. The applicant should test a smaller, less fragmented scheme alongside coordinated infrastructure options. PINS questions the unexplained 10 km cumulative study area and draws attention to coordination with other NSIPs. Assessment must cover combined and sequential construction, farmland loss, landscape, heritage, ecology and drainage effects.

At Botley West, significant landscape and visual effects received substantial negative weight. The Secretary of State rejected reliance on uncertain future mitigation and post-consent assessment of effects that should have informed the decision. Here, the evidence must show the combined extent of development across Romney Marsh, including views towards and between schemes and the effects of grid infrastructure. It must test whether a smaller scheme, different layout or removal of sensitive areas would avoid harm before relying on planting.

The ecological evidence must address bird use of land outside designated sites, displacement and the combined loss of suitable habitat. Biodiversity gains cannot be assumed to cancel significant effects. PINS requires mitigation and enhancement to be distinguished and habitat mitigation not to be double counted as biodiversity gain.

Soil protection, drainage and battery safety must be demonstrated together. PINS rejects assumed operational soil benefits without an established management regime, and highlights sealed firewater containment for batteries and substations. Consultation should explain how soils, watercourses and groundwater would be protected, including during an incident, and how restoration would be secured.

The mitigation hierarchy must be a genuine design process, starting with avoidance. In Botley West, the Secretary of State agreed with the Examining Authority's criticism that the applicant had treated impacts as inevitable and acceptable because the scheme was Critical National Priority (CNP) infrastructure. The consultation should show which areas have been excluded, which alternatives have been rejected and why, and what harm remains. CNP status cannot substitute for that work.

Conclusion

CPRE Kent strongly objects to the scheme proceeding as currently presented. These concerns go to whether this is the right location and scale of development. They cannot be resolved through screening, buffers or other detailed mitigation alone. CPRE is calling for a pause on new approvals for ground-mounted solar farms of 30 MW or more until the Strategic Spatial Energy Plan is in place. We therefore ask the applicant to pause this proposal. Its location and scale should be reconsidered against that plan and a coordinated assessment of energy infrastructure across Romney Marsh. The combined effects of these schemes must inform decisions about where development should go, rather than be addressed after individual designs have been settled.

Botley West is a clear warning that even a very large CNP solar scheme can be refused where its harms outweigh its benefits. The Secretary of State gave substantial positive weight to energy need, yet refused consent. The reasons included unjustified use of BMV farmland, harm to heritage settings, significant landscape and visual impacts, and failure to apply the mitigation hierarchy properly. These findings reinforce the concerns CPRE Kent is raising about South Kent Energy Park and the wider Romney Marsh proposals.

Each scheme must be judged on its evidence, but approval cannot be assumed. South Kent should respond now by reconsidering its location and scale, rather than carrying unresolved harms into an application.

Appendix 1 — CPRE Kent EIA scoping response to Folkestone and Hythe District Council dated 19 June 2026.

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

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, EcIA 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.