

South Brooks Solar Farm

EIA Scoping Report

Volume 1
Main Report

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Blue Planet Solar Limited



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1. Introduction

1.1.1. Logika Group has been commissioned to prepare the Environmental Impact Assessment (EIA) Scoping Report to accompany a request for a Scoping Opinion from the Planning Inspectorate (prepared on behalf of the Secretary of State) for the proposed South Brooks Solar Farm by Blue Planet Solar Limited (the 'Applicant').

1.1.2. The South Brooks project comprises the construction, operation and decommissioning of a solar photovoltaic (PV) array electricity generating facility across approximately 1,094 hectares (ha) of land (the 'Site'), with approximately 1,043ha of the Site located within Kent County Council, and approximately 51ha located within East Sussex County Council. The project includes solar PV arrays, onsite substation(s), Battery Energy Storage System (BESS) units, power conversion stations and associated grid connection infrastructure which would allow for the generation and export of electricity (hereafter 'the Proposed Development'). The Proposed Development would allow export of 500 megawatts (MW) of electricity¹.

1.1. The Applicant

1.1.3. South Brooks Solar Farm is being promoted by Blue Planet Solar Limited. This is a joint venture between EDF power solutions UK and Ireland, and PS Renewables.

1.1.4. The Applicant (EDF power solutions UK and Ireland) develops, constructs, and operates onshore and offshore wind farms, solar arrays, battery storage, hydrogen innovations, and electrical vehicle charging infrastructure. The Applicant operates over 2 gigawatts (GW) of renewable energy assets across the UK and Ireland, with approximately 14GW of solar, energy storage and other renewable energy projects in its pipeline. The Applicant has an operating portfolio of 50 renewable energy sites across the UK and Ireland, including the Teesside Offshore Wind Farm (450MW), Burwell Solar Farm (49.9MW) and would soon be commencing construction of Longfield Solar Farm (400MW) in Essex.

1.1.5. The Applicant (PS Renewables) is an established UK-based renewable energy development and construction company, with an existing solar portfolio totalling more than 1.35GW of electricity.

1.1.6. The Applicant is committed to ensuring that their presence contributes to sustainable growth and development, helping to support the UK in

¹ This is as per the current grid connection agreement, which is subject to change depending on the final Gate 2 offer.

meeting its legally binding net zero targets and benefitting the communities in which it operates.

1.2. Consenting Regime and Requirement for Environmental Impact Assessment

Purpose of EIA

- 1.2.1. Underpinned by the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017², as amended (hereafter referred to as the ‘EIA Regulations’), EIA is a formal process required for certain types of development that brings together information to identify the likely significant environmental effects of a project and measures for avoiding, preventing, reducing or, if possible, offsetting likely significant effects. It provides decision-makers with the environmental information needed to make sustainable decisions when determining applications for certain developments and provides information on the likely significant effects of certain developments to the public as part of participating in the planning process.

The need for EIA

- 1.2.2. The aim of EIA is to protect the environment by ensuring that a determining body, such as the Secretary of State, when deciding whether to grant consent for a project which is likely to have significant effects on the environment, does so in the full knowledge of these likely significant effects, and thus takes them into account in the decision-making process. The EIA Regulations set out a procedure for identifying those projects which should be subject to an EIA, and for assessing, consulting, and coming to a decision on those projects which are likely to have significant environmental effects.
- 1.2.3. The EIA Regulations at Schedule 1 set out the types of development which must be subject to an EIA while developments listed in Schedule 2 may be subject to an EIA if they are considered “*likely to have significant effects on the environment by virtue of factors such as its nature, size or location*”. The criteria on which this judgement must be made are set out in Schedule 3 of the EIA Regulations.
- 1.2.4. The Proposed Development is “*Schedule 2 development*” paragraph 3(a) of Schedule 2 of the EIA Regulations, being:
- “*Energy industry*”

² His Majesty’s Office (HMSO) (2017) Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

a) industrial installations for the production of electricity, steam and hot water (projects not included in Schedule 1 to these Regulations);”

Requirement for a DCO

- 1.2.5. As the Proposed Development is an onshore generating station in England exceeding 50MW of electricity it is automatically classified as a Nationally Significant Infrastructure Project (NSIP) and therefore requires a Development Consent Order (DCO) under Sections 14(1)(a) and 15(2) of the Planning Act 2008³. In this instance the Applicant has concluded that the Proposed Development does require an EIA as the Proposed Development could lead to likely significant environmental effects. Owing to the potential for the Proposed Development to meet the criteria within Schedule 3 of the EIA Regulations, Regulation 8(1) allows for the Applicant to undertake one of the following options, “*a) ask the Secretary of State to adopt a screening opinion in respect of the development to which the application relates; or b) notify the Secretary of State in writing that the person proposes to provide an environmental statement in respect of that development.*” The Applicant has therefore chosen to proceed with option (b) to produce the documentation to inform an EIA. And so, this Scoping Report represents under Regulation 8 (1)(b) a notification that the Applicant would prepare and submit an Environmental Statement (ES) in support of the DCO without prior request for a Screening Opinion.

Purpose and Structure of the Scoping Report

- 1.2.6. The process of identifying the issues to consider within the ES and establishing the scope of the assessment, is known as ‘scoping’. Although scoping is not a mandatory requirement under the EIA Regulations, it is recognised as a useful preliminary procedure which helps to identify the main effects that a proposed development is likely to have on the environment.
- 1.2.7. The purpose of this Scoping Report is to request an opinion from the Secretary of State on the scope, and level of detail, of the information to be provided in the ES under Regulation 10(1) of the EIA Regulations. This would help ensure that the EIA is focused on the key impacts likely to give rise to significant environmental effects and is also used to obtain agreement on the approach and methodologies for assessments which would be reported in the ES, which would accompany the application for the DCO. This Scoping Report also provides the justification and rationale for scoping out environmental aspects or receptors where it is considered that significant environmental effects are unlikely to arise as a result of the Proposed Development.

³ His Majesty’s Office (HMSO) (2008) Planning Act 2008 (as amended)-
<https://www.legislation.gov.uk/ukpga/2008/29/contents>

- 1.2.8. In line with the requirements of Regulation 10(3) of the EIA Regulations, this request contains the following information, as presented in Table 1.1, to assist the Planning Inspectorate (PINS), on behalf of the Secretary of State, in adopting a Scoping Opinion.

Table 1.1 EIA Regulation Scoping Information

Regulation 10(3)	Evidence in Scoping Report
A plan sufficient to identify the land where development could occur	Figure 2.0: The Proposed Development
A description of the Proposed Development, including its location and technical capacity	Chapter 2: Description of the Site and Surrounding Area Chapter 3: The Development Proposals
An explanation of the likely significant effects of the Proposed Development on the environment	Technical Aspect Chapters 6 to 19
Such other information or representation as the person making the request may wish to provide or make	Technical Aspect Chapters 6 to 19

- 1.2.9. In addition, this Scoping Request has been prepared in accordance with PINS Advice Note Seven⁴, which recommends that a request for a Scoping Opinion should also include the details in Table 1.2.

Table 1.2 PINs Request for Scoping Information

PINS Advice Note Seven	Evidence in Scoping Report
The Proposed Development	
An explanation of the approach to addressing uncertainty where such remains in relation to elements of the Proposed Development e.g. design parameters	Chapter 3: The Development Proposals Chapter 5: Approach to EIA Appendix B: Scoping Commitments Register
Referenced plans presented at an appropriate scale to convey clearly the information and all known features	Figure 2.0: The Proposed Development

⁴ The Planning Inspectorate (March 2025), Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements. [Online]. Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an>

associated with the Proposed Development

EIA Approach and Topic Areas

An outline of the reasonable alternatives considered and the reasons for selecting the preferred option	Chapter 3: The Development Proposals
A summary table depicting each of the aspects and matters that are requested to be scoped out allowing for quick identification of issues	Technical Aspect Chapters 6 to 18
A detailed description of the aspects and matters proposed to be scoped out of further assessment with justification provided	Appendix C: Solar Scoping Table Chapter 19: Environmental Topics Scoped Out
Results of desktop and baseline studies where available and where relevant to the decision to scope in or out aspects or matters	Technical Aspect Chapters 6 to 18
Aspects and matters to be scoped in, the report should include details of the methods to be used to assess impacts and to determine significance of effects e.g. criteria for determining sensitivity and magnitude	Chapter 5: Approach to EIA Technical Aspect Chapters 6 to 18
Any avoidance or mitigation measures proposed, how they may be secured and the anticipated residual effects	Technical Aspect Chapters 6 to 18

Information Sources and Guidance

References to any guidance and best practice to be relied upon	Technical Aspect Chapters 6 to 18
Evidence of agreements reached with consultation bodies (for example the statutory nature conservation bodies or local authorities)	Technical Aspect Chapters 6 to 18
An outline of the structure of the proposed ES	Chapter 5: Approach to EIA

- 1.2.10. A detailed assessment of potential effects upon any associated internationally designated sites would be undertaken as part of a separate Habitats Regulations Assessment (HRA) in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit)

Regulations (2019⁵)). The HRA would be submitted as a separate package of documents alongside the ES. It is not the function of the ES to duplicate this assessment; rather, the ES would summarise and reference the key findings of the HRA where relevant to the EIA process, ensuring cross-referencing between the two assessments for clarity and completeness.

1.3. Approach to Scoping Solar Development

- 1.3.1. In addition to the above, in March 2025 PINS published technical advice specific to the scoping of solar developments⁶. The PINS solar scoping advice was prepared with regard to matters raised on previous NSIP applications. The purpose of the advice is to support greater proportionality by applying a comprehensive, evidence-based approach to EIA scoping for solar development. This includes the use of a Solar Scoping Table (an example of which is provided within the technical advice) to set out the evidence of and justifications for aspects and/or matters scoped out of the EIA. This may include information on the environmental baseline, details of the Proposed Development, details on the pathways and commitments to management measures.
- 1.3.2. To ensure clarity as to how the relevant details within the Solar Scoping Table are secured, a Scoping Commitments Register has been included within **Appendix B**. This Register follows PINS Guidance⁷ and would identify how commitments would be secured and implemented, to ensure potential environmental effects arising from the project are mitigated as far as possible, in accordance with the mitigation hierarchy. It is noted that the Commitments Register is a 'live' document that would be updated throughout the NSIP planning process.
- 1.3.3. A Solar Scoping Table for the South Brooks Solar Farm is provided in **Appendix C**. This sets out the aspects and matters which have been scoped out of the EIA along with the evidence supporting why likely significant effects are unlikely to occur.

1.4. Project Team

- 1.4.1. Regulation 14(4) of the EIA Regulations require that to ensure the completeness and quality of the ES, *'(a) the applicant must ensure that the environmental statement is prepared by competent experts; and (b) the environmental statement must be accompanied by a statement from*

⁵ His Majesty's Government (2019) The Conservation of Habitats and Species (Amendment) (EI Exit) Regulations 2019 [Online] available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573>

⁶ Planning Inspectorate (2025) Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-technical-advice-page-for-scoping-solar-development>

⁷ Planning Inspectorate (2025) Nationally Significant Infrastructure Projects: Commitments Register. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register>

the applicant outlining the relevant expertise or qualifications of such experts.'

- 1.4.2. In accordance with this requirement Table 1.3 sets out the technical specialists and their relevant expertise who have contributed to the preparation of this Scoping Report and would undertake the EIA that would be reported in the ES. Table 1.3 shows the EIA team is competent to undertake the EIA.

Table 1.3 – Project Team and Description of Competence

Company	Aspect Covered	Qualifications	Description of Competence
Logika Group	EIA	BSc (Hons) MIAQM AMIEEnvSc PISEP	Environmental consultant with more than 15 years' experience overseeing the production of EIA reports and Environmental Statements for a range of developments, including solar, throughout the UK. The EIA lead most recently led the EIA and environmental work for a solar farm DCO in Lincolnshire.
Logika Group	EIA	BSc (Hons), MSc (Hons), PISEP	Environmental consultant with more than 6 years' experience undertaking and managing the production of EIA reports and Environmental Statements for a range of developments, including solar, throughout the UK. They have most recently been involved in a number of solar DCO schemes across the UK.
Logika Group	Biodiversity	Technical Director, BSc (Hons), MSc, Phd	20 years of consulting experience, leading biodiversity inputs on a number of nationally significant infrastructure projects (NSIPs) including input into Environmental Statements as part of the Development Consent Order applications for wind, airport expansion and solar projects in the UK.
Logika Group	Hydrology	Technical Director, Ba (Hons), MCIWEM, C.WEM	17 Years experience in Flood Risk and Drainage, including extensive experience of recent Solar DCO projects including a solar farm DCO in Lincolnshire. Chartered member of CIWEM.
ADAS	Agricultural Soils	BSc (Hons), MEnv, M.I. Soil Sci	Soils discipline lead on numerous DCO projects including several solar farm projects across the UK.
Headland Archaeology	Buried Heritage and Built Heritage	BA (1st Class Hons), Member of Chartered	Thirteen years' experience within the heritage industry, the past 8 in heritage consultancy. Has performed Heritage Lead

Company	Aspect Covered	Qualifications	Description of Competence
		Institute for Archaeologists (MCIfA)	roles for four solar DCO projects and numerous Town and Country Planning Application solar projects nationwide.
Iceni	Landscape and Visual	CMLI	Associate Landscape Architect working on complex projects as part of multidisciplinary teams, including preparation of landscape planning and design deliverables for Nationally Significant Infrastructure Projects. Part of the landscape team for a DCO consented solar farm as well as another solar DCO project in examination.
Pell Frischmann	Transport and Access	Sector Director. BEng (Hons), MSc, CEng, FCIHT, CMILT	28 years' experience in the preparation of transport studies. Chartered Engineer and Fellow of the CIHT.
Nature Positive	Carbon and Climate Change	BA (Hons), MSc (Distinction), PISEP	Senior Consultant providing specialist knowledge and technical experience in Greenhouse Gas (GHG) Assessment, with 20+ EIA climate and carbon balance chapters and pre-examination phases for three solar DCOs.
Logika Group	Noise and Vibration	BEng (Hons), BSc (Hons)	Over 20 years' experience in environmental noise and vibration assessment.
Logika Group	Human Health	MSc, BSc	Technical director who has delivered Health Impact Assessments for commercial projects, and has undertaken health, equality and distributional impacts of local and national policies. Member of the national Committee on the Medical Effects of Air Pollution (COMEAP).
Logika Group	Socioeconomics and Tourism	BA(Hons), MSc	Environmental policy and economics expert with 20 years' professional experience. Specialist in socio-economic impact assessment, cost benefit analysis, impact assessment and valuation, in the context of government policy as well as

Company	Aspect Covered	Qualifications	Description of Competence
			development plans and projects. Extensive experience of preparing and reviewing socio-economic assessment as part of the EIA and DCO processes (including airports, nuclear power stations, wind and solar farms, urban extensions, and various mixed-use developments in the UK and overseas).
Logika Group	Air Quality	PhD, MSc, BSc, CSci	Member of the IAQM and IES. Over 18 years' experience in air quality consultancy, with numerous solar farms and DCO projects completed.
RSK Geosciences	Ground Conditions	BSc (Hons), MSc, Chartered Geologist, European Geologist	Lead consultant for provision of land and groundwater inputs to projects that require the preparation of ESs, including DCO and DNS projects.

2. Description of the Site and Surrounding Area

2.1. Site Location and Boundary

- 2.1.1. The extent of the land where development could occur is presented in **Figure 2.0 within Appendix E**.
- 2.1.2. The Site is located at OS grid reference TR041215, which is the approximate centre of the Site. The Site boundary is shown in **Figure 2.1 within Appendix E** and consists of approximately 1,094 hectares (ha) of land. Local ditches and field margins form the boundaries to many of the fields within the Site boundary, with further sporadic areas of hedgerow and vegetation, trees and woodland.
- 2.1.3. Approximately 1,043ha of the Site boundary is located within Kent County Council, and approximately 51ha located within East Sussex County Council, in the westernmost extents of the Proposed Development. In total, the Site sits across two county boundaries, as well as two district council boundaries (Folkestone and Hythe District Council and Rother District Council). The Site is part of the Dungeness headland, a predominant feature of the Kent coast, which is characterised by its shingle beach on the English Channel.
- 2.1.4. As above, the extent of the land where development could occur is presented in **Figure 2.0 within Appendix E**. The land which makes up the Site boundary is split into six different land parcels which are labelled South Brooks A to South Brooks F, as detailed in **Figure 2.1 within Appendix E**. As part of the Proposed Development, electricity cabling would be required to connect the Site boundary to the Dungeness Substation. At this stage of the Proposed Development, design and environmental optioneering is still at an early stage. Therefore, underground and overhead line cabling search areas have been presented within the figures for the Proposed Development as search areas to which potential cable routes could be constructed. Further environmental baseline information is presented in **Chapters 6 to 18**.
- 2.1.5. The Site boundary is located in direct proximity to, and is partially dissected by, three statutory main rivers, including the White Kemp and Jury's Gut Sewer which partially run through the western part of the Site boundary. There are a number of ditches associated with field boundaries which are located across the Site.
- 2.1.6. The nearest towns and villages in proximity to the Site boundary include:
- Lydd, located approximately 25m from the nearest Site boundary to the east;
 - Greatstone, located approximately 40m from the nearest Site boundary to the east;
 - New Romney, located approximately 360m from the nearest Site boundary to the north;

- Old Romney, located approximately 1.4km from the nearest Site boundary to the north-west;
- Lydd-on-Sea, located approximately 3.6km from the nearest Site boundary to the east; and
- Dungeness, located approximately 4.3km from the nearest Site boundary to the south-east.

2.1.7. There are also a number of isolated properties and hamlets which are dispersed throughout the landscape.

2.2. Environmental Characteristics

2.2.1. The below paragraphs present details relating to the main environmental characteristics of the Site and surrounding area. A detailed summary of the environmental baseline is contained within each of the individual environmental aspect chapters (see **Chapters 6 to 18**). **Figure 2.2 within Appendix E** presents the location of designated and non-designated ecological and heritage assets which indicate the characteristics of the Site, and their proximity to the Site boundary. **Figures 2.3 to 2.7 within Appendix E** also set out the proximity of the Site boundary to nationally and internationally designated ecological sites. Due to their boundary overlaps, these sites are presented as separate figures.

Land Use

- 2.2.2. The Site is predominantly arable agricultural land and includes a network of drains and ditches, sporadic woodland and areas of hedgerow, as well as small areas of made ground, and areas of vegetated shingle in wider proximity to the Site. The Agricultural Land Classification (ALC) regional mapping published by Natural England indicates that the Site consists of a mixture of Grade 1 (Excellent), Grade 2 (Very Good), Grade 3 (Good to Moderate) and Grade 4 (Poor) land. A plan showing indicative ALC grades across the Site boundary is provided in **Figure 8.3 within Appendix E**. Given these ALC grades are based on guidance provided by Natural England, ALC surveys across the Site boundary have commenced to confirm the ALC grade(s) of the land within the Site boundary.
- 2.2.3. As discussed in **Chapter 8: Agricultural Soils**, detailed fieldwork to study the soil across the Site commenced in October 2025 and is anticipated to be completed in January 2026. The results of the soils would be discussed with Natural England and reported in the Environmental Statement (ES).

Water Resources

- 2.2.4. A network of drains and field ditches run through the Site boundary, and there are also a number of small lakes in proximity to the Site boundary, associated with current and historic quarrying in the local vicinity. There are three statutory main Rivers within and in proximity to the Site boundary, including the

Dengemarsh Sewer Water Body which runs through the southern parcel of the Site, Southbrooks sewer which runs from Lydd southwards to the English Channel, and the White Kemp and Jury's Gut Sewer which is located immediately to the north of Lydd.

- 2.2.5. As shown in **Figure 2.2 within Appendix E**, approximately 72.6% of the Site boundary is within Flood Zones 2 and 3, indicating a medium and high probability of flooding. 27.4% of the Site boundary is located in Flood Zone 1, indicating a low probability of flooding. This flooding is considered to originate and be predominantly associated with tidal sources. There are no flood defences within the Site boundary, however the Site does benefit from the presence of flood defences in proximity to the South.
- 2.2.6. The Site is predominantly considered to be at low risk of surface water flooding. As shown in **Figure 7.8 within Appendix E**, there are however localised areas within the Site boundary which are shown to be at low, medium and high risk, which are largely associated with the field ditches, drains and sewers within the Site.

Biodiversity

- 2.2.7. The Site boundary is partially located within an area of SSSI and sits within a locational context where several different statutory ecological designations are present (See **Figures 2.3 to 2.7 within Appendix E**). The closest statutory designations to the Site are summarised in Table 2.1 below. Further information is presented in **Chapter 6: Biodiversity**.

Table 2.1: Statutory Ecological Designations

Designation	Distance to Site	Description
Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest	Located partially within the Site boundary.	The Dungeness, Romney Marsh and Rye Bay Site of Special Scientific Interest (SSSI) is approximately 9090ha in size and was designated as a SSSI in 2006. The SSSI is identified as a nationally important site for a diverse range of biological features, specifically the coastal geomorphology of Dungeness and Rye Harbour, and nationally important habitats including saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems and basin fens. These habitats support

nationally important species including vascular plant species, breeding birds, waterfowl, great crested newts, and other invertebrates. The site contains the largest and most diverse area of shingle beach in Britain.

Dungeness, Romney Marsh and Rye Bay Ramsar Site

Approximately 5m from the nearest point of the Site boundary to the east.

The Dungeness, Romney Marsh and Rye Bay Ramsar Site is approximately 6377ha in size, with the site boundary being coincident with the boundaries of the Dungeness, Romney Marsh and Rye Bay SSSI. The site is designated as a Ramsar site (a wetland of international importance) because it contains a number of representative, rare or unique examples of natural or near-natural wetland types, including:

- Greater water-parsnip;
- Warne's thread-moss;
- Water vole;
- Aquatic warbler;
- Great crested newt;
- Medicinal leech;
- Ground beetle;
- Marsh mallow moth; and
- De Folin's lagoon snail.

The site also qualifies as a Ramsar site as it regularly supports 20,000 or more waterbirds and supports 1% of individuals in the populations of mute swan and shoveler in any season.

Dungeness, Romney Marsh and Rye Bay Special Protection Area (SPA)

Approximately 5m from the nearest point of the Site boundary to the east.

The Dungeness, Romney Marsh and Rye Bay SPA (Marine Designation) is approximately 4010ha in size, and the SPA boundary is coincident with the boundaries of Dungeness,

**(Marine
Designation)**

Romney Marsh and Rye Bay SSSI. The site qualifies as a SPA as it is regularly used by 1% or more of a number of bird species in any season, including Bewick's swan and Golden plover, and also qualifies as a SPA because it is used by over 20,000 waterbirds.

**Dungeness
Special Area of
Conservation
(SAC)**

Approximately 60m from the nearest point of the Site boundary to the south.

The Dungeness SAC is approximately 3241ha in size and is coincident with the boundaries of Dungeness, Romney Marsh and Rye Bay SSSI. The site is characterised by areas of shingle and is designated due to the annual vegetation of drift lines, perennial vegetation of stony banks, and also the presence of great crested newt.

**Dungeness
National Nature
Reserve (NNR)**

Approximately 75m from the nearest point of the Site boundary to the east.

Dungeness has been designated as a National Nature Reserve (NNR) because it is one of the largest shingle landscapes in the world. It is home to a number of uncommon plants and insects, as well as migratory birds, and is jointly owned and managed by Natural England and RSPB.

**Romney Warren
Local Nature
Reserve (LNR)**

Approximately 1.8km from the nearest point of the Site boundary to the north.

The Romney Warren Local Nature Reserve (LNR) is part of Romney Warren Country Park and is located within an area of the Dungeness, Romney Marsh and Rye Bay SSSI. The site is an area of fixed dune grassland which is home to important seasonal ponds where great crested newt, diving beetles and dragonflies have been identified. The site was designated as a LNR in 2001.

Rye Harbour LNR	Approximately 3.9km from the nearest point of the Site to the west.	The Rye Harbour LNR is located in two separate areas to the south of Rye, in immediate proximity to Rye Harbour and further stretches to Winchelsea Beach. Habitats present include vegetated shingle, saltmarsh, saline lagoons, reedbed and open water. Species of breeding bird and coastal vegetation are present.

- 2.2.8. The RSPB Dungeness nature reserve is located approximately 150m from the nearest point of the Site to the south-east. The reserve is approximately 1000ha in size and is owned and operated by the RSPB. According to the RSPB, this reserve provides breeding habitat for a variety of species including lapwing, redshank and uncommon bumblebee species. It is predominantly known for the variety of breeding and migratory bird species which utilise the reserve across different seasons, coinciding with the species which are identified as part of the SSSI, SAC and SPA designations that cover the reserve.
- 2.2.9. Surveys are currently taking place on the Site to identify if there is any land that is frequently utilised by notified features and if any of the land within the Site boundary therefore constitutes Functionally Linked Land (FLL). Further details on ecology surveys taking place are found within **Chapter 6: Biodiversity**.

Built Heritage

- 2.2.10. There are no listed buildings or Registered Parks and Gardens within the Site boundary. The closest listed buildings in proximity to the Site boundary are the Grade II listed Jack's Court Jacques Court Farmhouse (approximately 125m from the nearest point of the Site boundary to the west) and the Grade II listed Scotney (approximately 127m from the nearest point of the Site boundary to the south). There are no Conservation Areas located within the Site boundary, the nearest of which is the Lydd Conservation Area, which is approximately 500m from the nearest point of the Site boundary.
- 2.2.11. Further details are provided in **Chapter 10: Built Heritage**.

Archaeology

- 2.2.12. There are no Registered Battlefields or World Heritage Sites within 1km of the Site boundary. There is one Scheduled Monument located within 500m of the Site boundary, which is the Abandoned Medieval Church and Graveyard, Midley, approximately 500m from the closest point of the Site to the north. Other Scheduled Monuments in proximity to the Site boundary include:

- Part of a Cistercian grange, north of New Romney High Street, also known as Romney Priory (approximately 900m from the nearest point of the Site boundary to the north);
- Three acoustic early warning devices 2360m east of Jack's Court (approximately 1.2km from the nearest point of the Site boundary to the east); and
- Hope All Saints', remains of church (approximately 1.3km from the nearest point of the Site boundary to the north).

2.2.13. Further details are discussed in **Chapter 9: Archaeology**.

2.2.14. A geophysical survey across the accessible land within the Site boundary commenced in September 2025 and is anticipated to be completed in November 2025. Preliminary information from the survey would be discussed with Kent County Council Archaeologist in terms of further investigation. The final results would be reported in the ES.

Transport and Access

2.2.15. The Site is predominantly accessible from a number of existing field accesses that are capable of facilitating the movement onto the Site boundary of large agricultural machinery. Lydd and surrounding areas are accessed through the B2075 from the north, and from Rye the area is accessed by Jury's Gap Road. Access is restricted in certain areas including within Lydd Ranges and Military Camp operated by the Ministry of Defence (MoD).

2.2.16. Sustrans National Cycle Network Route 2 is located through the centre of Lydd. This is a long-distance cycle route which links Dover in Kent with St. Austell in Cornwall via the south coast of England. NCR Route 11 is also in proximity to the Site boundary and connects to Route 2 in Lydd, following the local road network north towards Appledore. There are three local Public Rights of Way (PRoW) and two public bridleways that run through the Site boundary. Further footpaths, bridleways and restricted bypaths are located around Lydd. The King Charles III England Coast Path runs approximately 150m south of the Site boundary at its closest point. Further information on the local transport network and footpath information is included within **Chapter 12: Transport and Access**, and **Chapter 16: Socioeconomics**.

Existing Infrastructure

2.2.17. The site of the former Dungeness A nuclear power station is located to the south-east of the Site boundary and was decommissioned in 2006. Dungeness B nuclear power station is also located on the same site and was the first Advanced Gas-cooled reactor to begin construction in the UK. In 2021 Dungeness B began defueling and is expected to be fully decommissioned over

a period of several years⁸. The remaining infrastructure includes extensive roadways and access roads, office and other working facilities, as well as reactor buildings and other infrastructure associated with Dungeness A.

- 2.2.18. Adjacent to the site of Dungeness A and B is located a National Grid 400kV and 275kV substation, to which the Proposed Development would connect into. As discussed in **Chapter 3: The Proposed Development**, the Applicant has secured a connection agreement with National Grid which would allow export and import of 500MW of electricity to and from the Dungeness substation.
- 2.2.19. National Grid 400kV overhead power lines carried by pylon structures are located to the south of the Site at Dungeness and travel north-west through the Site towards Ninfield substation, north of Bexhill-on-Sea to the west of the Proposed Development. The 400kV overhead line also splits at the central parcel of the Site boundary, moving north towards Sellindge converter station, which is south-east of Ashford. These numerous pylons and high voltage overhead power lines dominate the localised setting (further detail is provided in **Chapter 11: Landscape and Visual**).
- 2.2.20. A utilities search within and in proximity to the Site boundary would continue as the Proposed Development evolves. Initial data has identified the presence of utilities connections within the Site boundary including water pipeline routes managed by Affinity Water, National Grid Electricity Transmission lines, BT Openreach fibreoptic cabling, as well as other electricity cabling managed by UK Power Networks. Utilities associated with Network Rail also follow the existing railway line. Generally, the identified assets have been installed within the local road network corridors and are concentrated via Dungeness Road, B2075 Romney Road, Dennes Lane and Dengemarsh Road.
- 2.2.21. The Little Cheyne Court Wind Farm is located approximately 50m west of the Site boundary. The wind farm includes 26 turbines each 115 metres high and has a peak generation capacity of 59.8MW. The site has been operational since 2009.
- 2.2.22. Approximately 1.7km to the north of the closest part of the Site boundary is Sycamore Farm Solar Farm, which spans an area of approximately 46 hectares and has an operational capacity of up to 20MW. This site has been operational since 2014.
- 2.2.23. Lydd Ranges and Military Camp is located immediately to the south of Lydd town centre. A small part of the Site boundary is located within an unused area of Lydd Ranges. The site is principally used for military training and extends to the Kent coast.

⁸ EDF Energy (7th June 2021) "EDF decides to move Dungeness B into defueling phase" [Online] Available at: <https://www.edfenergy.com/media-centre/news-releases/edf-decides-move-dungeness-b-defuelling-phase>

- 2.2.24. While Lydd does not have a passenger rail connection, the previous Appledore to Dungeness line does still operate as a freight route, terminating at a railway siding at Dungeness. This is primarily used to move spent nuclear fuel from Dungeness B to Sellafield in Cumbria for reprocessing and storage. Therefore, the rail line itself is used sporadically. The line itself runs north of Lydd town centre.
- 2.2.25. Whilst not a historic statutory or non-statutory designation, approximately 3.8km from the nearest point of the Site boundary to the south is a former pumping station associated with Operation PLUTO (Pipeline Under The Ocean), which involved the construction of a 17-mile undersea oil pipeline from Dungeness to France in support of the Allied invasion of Normandy in June 1944. The pipeline itself partially followed the Lydd rail track to a water tower at Dungeness. Components for the PLUTO line were delivered along the Romney, Hythe and Dymchurch Railway, which is now a local visitor attraction operating as a heritage railway.

3. The Proposed Development

3.1. Introduction

- 3.1.1. This chapter provides a description of the Proposed Development for the purposes of identifying and reporting the potential environmental impact and likely significant environmental effects in this EIA Scoping Report. In addition, this chapter draws attention to the need for flexibility in the design process and provides a description of the Proposed Development.
- 3.1.2. The description of development represents the current understanding of design parameters for the Proposed Development, which would be refined further as the project progresses toward Development Consent Order (DCO) submission. Parameters would be informed by operational needs, responses from consultation and engagement, environmental monitoring and modelling, engineering and technical design, and land engagement.
- 3.1.3. **Figure 2.0 within Appendix E** provides a plan sufficient to identify the land where development could occur. An Indicative Masterplan is also included within **Appendix D**, which was presented at Phase One Consultation (a period of non-statutory consultation on the early proposals which took place between the 18th September and the 30th October 2025).
- 3.1.4. As the Proposed Development progresses, the guiding principles for the detailed design of the Proposed Development would be developed in response to local context, consultation feedback, environmental monitoring and modelling, engineering and technical design considerations. These principles would also seek to align with specific guidance for Nationally Significant Infrastructure Projects (NSIP). Design principles would then be set out in the Design Approach Document which would be included as part of the DCO application. At this stage, draft design principles have not been provided, with the Commitments Register (see **Appendix B**) detailing early design-related commitments at this stage.

3.2. Approach to assessing uncertainty

- 3.2.1. Information provided on layout and design within the DCO application would be based on the principles of the 'Rochdale Envelope' in accordance with PINS Advice Note Nine: Rochdale Envelope⁹. The Rochdale Envelope is a recognised way of dealing with an application comprising EIA development where details of a project have not been fully resolved by the time the application is submitted. This means that maximum and minimum design envelopes would be adopted to provide sufficient flexibility for the later detailed design of the Proposed Development (detailed design would take place post

⁹ PINS (2018) Advice Note Nine: Rochdale Envelope (updated March 2025)[Online] available at: [Nationally Significant Infrastructure Projects - Advice Note Nine: Rochdale Envelope - GOV.UK](https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-nine-rochdale-envelope)

granting of the DCO and would be subject to a requirement in the DCO, for details to be approved by the relevant authority), whilst also allowing for a robust assessment of environmental effects (this assessment being based on maximum 'worst case' parameters) to be made.

- 3.2.2. To comply with the EIA Regulations, and to provide certainty to stakeholders such as the local community, it is crucial to define these parameters as narrowly as possible to accurately identify likely significant effects rather than exaggerating effects that are improbable.
- 3.2.3. The Environmental Statement (ES) would clearly explain which elements of the Proposed Development are yet to be finalised and provide reasons for this. Where flexibility is sought for any elements, the ES would set out the construction and design parameters and the works that would be involved for each of the parcels comprising the Proposed Development. With this in mind, the EIA would ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case', ensuring a robust assessment of the likely significant environmental effects. In addition to the Rochdale Envelope, following PINS Guidance¹⁰ to ensure clarity as to how environmental mitigation measures included within the design of the Proposed Development are secured, a Commitments Register would be included within the DCO application. As discussed in **Chapter 1: Introduction**, this would identify how commitments would be secured and implemented, to ensure potential environmental effects arising from the Proposed Development are mitigated as far as possible, in accordance with the EIA mitigation hierarchy (as set out **Chapter 5: Approach to EIA**).
- 3.2.4. In accordance with PINS Guidance, a Scoping Commitments Register is included in **Appendix B**, which provides details on the design of the Proposed Development, best practice measures to be included within the management plans, design parameters and any aspect specific commitments made by the Applicant at this (scoping) stage of the Proposed Development. It is noted that the Commitments Register is a 'live' document which would be updated throughout the DCO process.

3.3. Proposed Development

- 3.3.1. A description of the Site is presented in **Chapter 2: Description of Site and Surrounding Area**. The Site boundary extends across six separate parcels of land (South Brooks A-F) (see **Figure 2.1 within Appendix E** which shows these land parcels). **Figure 2.0 within Appendix E** presents the expected area of land potentially required for the construction, operation and decommissioning of the Proposed Development. It is important to note that this would be subject to change as the design and EIA progress. Together with the description of the

¹⁰ Planning Inspectorate (2024) Nationally Significant Infrastructure Projects: Commitments Register. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-commitments-register>

Proposed Development set out in Section 3.3, **Figure 2.0 within Appendix E** represents the current land which could form part of the Proposed Development. This allows for consideration of the potential environmental effects of the range of options under consideration, to ensure that the likely significant environmental effects of each of the component options has been scoped into the assessment.

Description of the Proposed Development

3.3.2. Solar Photovoltaic (PV) and Battery Energy Storage System (BESS) technologies are rapidly evolving. As a result of this, as above, the Rochdale Envelope would be used to allow and maintain flexibility for the optimal technology to be utilised at the time of construction. The design of the Proposed Development would consider and be sensitive to the surrounding environment, with the aim of avoiding and minimising adverse effects upon the identified environmental receptors. The Proposed Development would comprise the following components, to which further details are set out below:

- Ground Mounted Solar PV generating stations which comprises; modules and mounting structures;
- Balance of Solar System (BoSS) which comprises; inverters, transformers and switchgear;
- On-site substation(s); comprising transformers, switching and control equipment, office/control/welfare buildings, storage areas, and provisions for vehicular parking and material laydown areas;
- Collector compounds, comprising; switchgear, transformers, ancillary equipment, and operation, maintenance and welfare facilities and security cabins;
- BESS units which would be situated in a compound which would include; office/control/welfare buildings and associated inverters, transformers, switchgear and ancillary equipment and their containers, enclosures, monitoring systems, air conditioning, electrical cables and fire safety infrastructure;
- Ancillary Infrastructure including a network of cable circuits for the provision of security and monitoring, to connect the Proposed Development to the National Grid;
- Highways works to facilitate vehicular access to the Proposed Development;
- Security and boundary installation including fencing, lighting, gates and access facilitation works including tracks to connect to the public highway;
- Office, warehouse and plant storage buildings; and
- Landscaping, habitat management and biodiversity enhancement.

Solar PV Modules and Mounting Structures

- 3.3.3. Solar PV modules collect energy from sunlight and turn it into electricity in the form of low voltage, Direct Current (DC) electrical output. The solar PV modules would be strategically positioned to avoid sensitive environmental features, maintaining offsets as detailed within the Scoping Commitments Register (see **Appendix B**).
- 3.3.4. All solar PV modules shall be located within the area(s) set out within the Indicative Masterplan (**Appendix D**). The maximum height of the highest part of the solar PV modules shall be up to 4.5m above ground level, and the minimum height of the lowest part of the solar PV modules shall be 0.6m above ground level¹¹ The panels are likely to be bifacial, although this is to be confirmed at later design stages.
- 3.3.5. Typically, a solar PV module would be made up of individual bifacial photovoltaic cells that are arranged beneath layers of toughened glass and would be up to 2.5m long and 1.4m wide. The solar PV modules are currently proposed to be arranged in portrait orientation at 180 degrees, although this is subject to change as the design is further refined. The solar PV modules are likely to have dark blue, grey, or black surfaces, with an anti-reflective coating. Supporting frames would be constructed from anodized aluminium alloy or a similar finish, and modules would be mounted on racks made from galvanized steel or similar material. The solar PV modules would be installed at a tilt angle of 10° to 30° and would be south facing where possible to optimise solar capture. The solar PV modules would be fixed, and no solar tracking system is proposed.
- 3.3.6. The solar PV modules are fixed to a mounting structure and are known as a 'table'. Once the solar PV modules are electrically connected in groups they are known as 'strings'. Various factors would help inform the number and arrangement of the solar PV modules and it is likely some flexibility would be required to accommodate for future technology developments. PV tables would be up to four rows of solar PV modules wide, with a minimum spacing between each row of 2.5m to allow for maintenance access during operation and reduce shading effects. The arrangement of modules within a PV table shall be the same across the solar PV array, subject to similar topography and land characteristics such as flood zones (as described below). This shall be determined on an area-by-area basis.
- 3.3.7. The solar PV modules would be installed at varying heights in response to flood risk and the need to allow for at least 300mm freeboard¹² under the PV tables in the event of a flood. Depending on flood extents, ground clearance would be required, the extent of which is to be determined through the analysis of flood modelling data. The heights of the solar PV modules would also be influenced

¹¹ Minimum and maximum heights of PV modules are subject to agreement with the Environment Agency. Further detail would be provided as part of the DCO application.

¹² The precise freeboard is subject to confirmation by the Environment Agency following consultation.

by other environmental aspects such as landscape and visual impacts and cultural heritage effects. The heights are being discussed with the Environment Agency (with regards to flooding) and relevant statutory consultees as part of the ongoing design process.

- 3.3.8. The PV tables would be installed with foundations suitable for site conditions consisting of either galvanized steel posts or screw piles driven into the ground. In areas where ground penetration foundations are not feasible, reinforced concrete ballast foundations would be used. The pile depth for mounting structures would be up to 3m in depth. Archaeological investigation surveys (in the form of geophysical surveys) and ground investigation surveys are being undertaken. Results of these surveys would inform the mounting structure foundation type, depth and construction methodology.

Balance of Solar System (BoSS)

- 3.3.9. The BoSS incorporate the inverters, transformers and switchgear, and are required to manage the electricity generated by the solar PV modules and BESS. An explanation of each is provided below.

Inverters

- 3.3.10. Inverters would convert the electricity from DC collected by the PV modules into alternating current (AC) for grid transmission, which allows the electricity generated to be distributed to the collector compounds and then onto the South Brooks substation(s), where the voltage is increased allowing export onto the National Grid. The number of solar PV modules that can be connected to each inverter would be determined by the size of the inverters available in the market. Inverters may be either string (distributed across the PV module rows and mounted below the modules) or central (located with the transformers and switchgear as part of the BoSS, typically houses in steel or fibreglass enclosures). Inverter technology is in continuous evolution, with a typical string inverter shown indicatively in Plate 3.1, and a typical centralised inverter within Plate 3.2.

Plate 3.1 Typical String Inverter



Plate 3.2 Typical Centralised Inverter



Transformers

- 3.3.11. Transformers are required to step up the voltage of electricity generated across the Proposed Development before it reaches the substation(s) or collector compound, in turn connecting to the existing National Grid Dungeness Substation. They can either be located standalone outdoors adjacent to the inverters and switchgear, or housed alongside the inverters and switchgear in a single container of a similar size to a shipping container. A typical outdoor transformer is indicatively shown in Plate 3.3 below.



Plate 1.3: Typical outdoor transformer

Switchgear

- 3.3.12. Switchgear includes electrical disconnect switches, circuit breakers, and protection devices designed to control, protect and isolate electrical equipment to safely manage the flow of electricity between the BESS, inverters, transformers, and the onsite Grid Transformers (GTs).
- 3.3.13. The above would either be housed ('integrated') together within an inverter and transformer station enclosure, or would be rated for outdoor use, where the infrastructure would be grouped separately within a compound. In both instances they would be a muted colour such as green or grey to be sympathetic with surroundings. The inverter and transformer station units would be pre-assembled and preconfigured with a maximum dimension of approximately 13m in length, 3m in width and 4m in height. The approximate footprint for locating the inverter, transformer and switchgear grouped outdoors within a compound, would be up to 20m in length, 5m in width and up to 4m in height. Monitoring and control systems would consist of manual controls at the conversion units, and automatic and centralised monitoring and control features at the control rooms on the onsite substations (see below).
- 3.3.14. The BoSS Units would be located within areas of solar infrastructure and would be designed (through appropriate setbacks and/or acoustic mitigation) and located to avoid likely significant effects to noise sensitive receptors. Where flood extents cannot be avoided, the BoSS would be raised above the design flood water event either on a plinth or piles, which would also accommodate appropriate freeboard. The maximum overall height shall be 6m above ground level. As above, the heights are being discussed with the Environment Agency (with regards to flooding) and relevant statutory consultees as part of the design process.

- 3.3.15. Fencing around the BoSS would comprise a fence with wooden or metal post supports typically with a height up to 2.5m above ground level, in a muted colour sympathetic to the surrounding environment, and with high tensile wire mesh.

On-site Substation(s)

- 3.3.16. An on-site substation(s) would comprise electrical infrastructure such as (but not limited to) the transformers, switchgear, control buildings and metering equipment distinct to the BESS, as required to facilitate the export of electricity to the existing National Grid Dungeness Substation. The decision on the number and location of substation(s) would be confirmed as the design evolves.
- 3.3.17. The substation(s) would have an indicative maximum size of up to 60,000m² with a maximum height of 15m above ground level, and would be located within its own compound. Foundations are likely to consist of a reinforced concrete base up to 2m deep.
- 3.3.18. A collector compound would be located adjacent to the substation where cables from BoSS Units and BESS would be brought together for onward connection to the substation. The compound would include control building(s), a switchroom (containing Switchgear), storage containers and other electrical equipment such as static compensation devices, auxiliary Transformers, fencing and acoustic barriers, and security and welfare cabin(s). The collector compound is expected to have a footprint of up to 25,000m² with a height of up to 7.1m.
- 3.3.19. Satellite collector compounds may also be used at different locations across the site. The satellite compounds may include auxiliary Transformers, maintenance building(s) and/or containers, security, welfare cabin(s), fencing and acoustic barriers. They may also include step-up Transformers, Switchgear, and a control room. Each satellite collector compound is expected to have a footprint of up to 25,000m² with a height of up to 7.1m.
- 3.3.20. The substation compound would be continuously operated, but not be permanently lit. External lighting would be mounted on columns up to 10m high. Task specific lighting would be used in the case of emergency works. Passive infra-red controlled lighting would be used where access is required outside of daylight hours. Operational lighting would be directed to within the Site boundary and would include features designed to reduce light spill beyond the areas required to be lit.
- 3.3.21. Within the substation compound there would be control buildings, which would have a maximum footprint of 600m² and a height of 7.1m above ground level. Foundations would consist of either a reinforced concrete base or plinth up to 500mm deep. Internal lighting within the control buildings would be used but light spillage controlled. The control buildings would be modular units finished in neutral colours, subject to manufacturer specifications and approval by Kent County Council.

- 3.3.22. Security fencing would be located around the substation compound; fencing would typically be a height of 3.4m above ground level depending upon the specific fencing type.

BESS units

- 3.3.23. BESS units are included within the Proposed Development. The BESS is designed to provide peak generation and grid balancing services to the electricity grid. It would do this primarily by allowing excess electricity generated from the solar PV generating station to be stored in batteries and dispatched when required. It may also import surplus energy from the electricity grid when energy available to the grid exceeds demand.
- 3.3.24. The BESS compound(s) shall include the following components:
- BESS units, each comprising an enclosure for electrochemical components and associated equipment. These enclosures may be joined or close-coupled, mounted on reinforced concrete slabs, or concrete piles. The container dimensions would depend upon the manufacturer chosen, however the containers are expected to have a maximum height of 6m;
 - Transformers with associated bunds for containment of cooling oil;
 - Inverters, switchgear, Power Conversion Systems (BoSS), and related ancillary equipment;
 - A switchgear / control room operates, isolates and controls the exported power from the BESS units. This would be located adjacent to the BESS units within the same compound;
 - Containers or enclosures housing any of the above equipment (along with monitoring and control systems), either integrated within the BESS containers/enclosures or housed separately;
 - Heating, Ventilation and Air Conditioning (HVAC) systems, (either integrated into the containers/enclosures mounted on top or sides, or located nearby as standalone units) to ensure the efficiency of the batteries;
 - Electrical cables, including those connecting to the grid interface; and
 - Fire safety infrastructure, such as water storage tanks, shut-off valves for fire water containment, and hard standing areas to allow access for emergency vehicles.
- 3.3.25. The precise location of BESS units would be confirmed as the design of the Proposed Development evolves. Early optioneering has taken into account the need to avoid proximity to residential property as well as sensitive environmental receptors including national and European designated sites, sensitive noise receptors as well as areas of Flood Zone 2 and 3.

Grid Connection

- 3.3.26. The Applicant has an agreed connection of 500MW at the National Grid Dungeness Substation. At this stage it is proposed to connect the Proposed Development utilising a Grid Connection Corridor. Further feasibility and assessment work is being undertaken to determine the route of the Grid Connection Corridor as well as the associated construction activities, to determine the best possible connection route from an environmental and engineering perspective. The underground and overhead line cabling search areas have been identified at this stage and are presented in **Figure 2.1 within Appendix E** and have been considered as part of the scope and methodology within **Chapters 6 to 18**.
- 3.3.27. To reach the point of connection at the National Grid Dungeness Substation, cabling would need to cross ecologically and geologically sensitive areas between these locations. Work is ongoing to consider the best method to do this and at this stage have included a number of options as presented in the underground and overhead line cabling search areas in **Figure 2.1 within Appendix E**. There is only one route along which overhead lines are being considered.
- 3.3.28. Should overhead lines be required, this infrastructure would be similar to and located adjacent to the existing pylons which connect to Dungeness Substation (new pylons would be up to 50m in height and have a tower footprint of approximately 15m in length and 15m in width). A sealing end compound would also be required to connect overhead electricity lines to underground cables and would contain equipment including switchgears to manage the transition between underground and overhead cabling. A typical sealing end compound footprint would be approximately 60m in length and 45m in width. Typical sealing end equipment height would be up to 12.5m at its highest point. At this stage of optioneering, the tower spacing and therefore the number of pylons required is not currently confirmed. This would be determined should an overhead option be selected.
- 3.3.29. Options for the Grid Connection Corridor would be considered in consultation with stakeholders, informed by the results of engineering and environmental assessments. More information about the proposed method and routing would be subject to consultation as part of the Phase Two consultation which would be carried out next year.

On-site Cabling

- 3.3.30. Associated infrastructure, including interconnecting cable route corridors between and within the solar parcels, is not considered within this Scoping Report. At this stage of the Proposed Development, route options for interconnecting cabling have not been developed and remain subject to further baseline data collection and technical optioneering.
- 3.3.31. In respect of both the Grid Connection Corridor, and the interconnecting cable route corridors, to support the ES, additional baseline investigations would be undertaken where required, including ecological, hydrological, and engineering

surveys. These surveys would inform a collaborative design optioneering process with relevant stakeholders to identify and assess viable options for the Grid Connection Corridor and interconnecting cable corridors. The design of this associated infrastructure, including any required mitigation measures to avoid or reduce likely significant effects, would be developed in consultation with relevant stakeholders. This iterative design process would be documented and presented in the ES, ensuring transparency and alignment with the mitigation hierarchy and applicable planning guidance.

- 3.3.32. Interconnecting cable route corridors would facilitate the transfer of electricity from the solar PV modules to the on-site substation, and the Grid Connection Corridor would involve cabling connecting the Proposed Development to the existing National Grid Dungeness Substation, which would export the electricity to the National Grid.
- 3.3.33. Low voltage on-site electrical cabling is required onsite between the solar PV modules and BoSS, as well as BESS units to inverters and inverters to transformers. All DC cable circuits shall be secured to the solar PV module mounting structures or shall be underground, with a maximum cable trench dimension of up to 2m wide and 2m deep. Cables may be deeper when crossing obstacles.
- 3.3.34. High Voltage AC electrical cabling would be utilised onsite between the BoSS to the project substation(s) and would be used in the Grid Connection Corridor from the project substation(s) to the existing National Grid Dungeness Substation. Up to two 400kV circuits are required to connect the on-site substation(s) to the Dungeness Substation. The high voltage cabling may be laid underground according to relevant British standards and regulations, with it being laid using a surface-dug method or via a trenchless crossing method (such as horizontal directional drilling (HDD)). Joint bays along the cable route would be located a minimum of 500m and a maximum of 1000m apart. The precise details of the high voltage cabling methods, as well as its routing, would take into account technical and environmental aspects and would be provided as part of the DCO application. along the cable route would be located a minimum of 500m and a maximum of 1000m apart. The precise details of the high voltage cabling methods, as well as its routing, would take into account technical and environmental aspects and would be provided as part of the DCO application.
- 3.3.35. Data cables would also be required to allow for the monitoring and collection of data relating to the export of electricity during the operation of the Proposed Development.

Works to facilitate vehicular access to the Site boundary

- 3.3.36. Access route options for construction, operation and decommissioning of the Proposed Development have not been detailed at this stage of the assessment and require additional survey work to inform their feasibility and alignment. The design of this associated infrastructure, including any required mitigation

measures to avoid or reduce likely significant effects, would be developed in consultation with relevant stakeholders. This iterative design process would be documented and presented in the ES, ensuring transparency and alignment with the mitigation hierarchy and applicable planning guidance.

Fencing, Security and Ancillary Infrastructure

- 3.3.37. Fencing around the solar PV modules would comprise a deer fence (posts and metal wire mesh) and would be up to 2.5 metres above ground level. External palisade fencing would be installed around the proposed substation(s), BESS and collector compounds, and would be up to 2.75m high, with internal monitored pulse fencing up to 3.4m high. Natural barrier methods such as hedge thickening would also be used where possible. All fencing would be a minimum of 10m from any National Grid overhead line tower bases. Appropriate mammal gates would also be incorporated.
- 3.3.38. Pole mounted CCTV towers would be installed within the Proposed Development up to a maximum height of 5m above ground level. CCTV lighting would be infrared (not visible in the dark) and would be permanently operated. Operational lighting would be directed within the Proposed Development, incorporating measures to minimise light spill beyond the areas required to be lit.
- 3.3.39. Further details of the fencing, security and ancillary infrastructure, which would consider technical and environmental aspects, would be provided as part of the DCO application.

Office, Warehouse and Plant Storage Buildings

- 3.3.40. The Proposed Development would include an office, warehouse and plant storage building, which would have a maximum height of 7.1m above ground and a maximum footprint of up to 600m². Any external waste storage shall be located within a fenced compound adjoining the permanent office, warehouse and plant storage building. The appearance of the buildings would reflect the local vernacular with standard agricultural style cladding to ensure visual consistency with the surrounding environment. The indicative location of the buildings would be within the compounds and would be provided as part of the DCO application information. Specific locations would be confirmed at detailed design stage.

Landscaping, habitat management and biodiversity enhancement

- 3.3.41. Existing hedgerows and trees, vegetated shingle, ditches, ponds and field margins and other areas deemed to have high landscape or biodiversity value would be avoided and retained as far as possible. Ensuring such would be a key priority in the pre-application design stage to inform the ES. For example, existing breaks in hedgerows or ditch crossing points would be used rather than creating new ones. Exceptions may occur when no other options exist and there is a need to create new access tracks, security fencing or cable routes.

- 3.3.42. The Proposed Development would incorporate a number of offsets from features such as drainage ditches, watercourses, water bodies, hedgerows and tree lines. Offsets to residential properties would be at least 100m and where required would be bespoke to take into account of the surrounding characteristics, setting and direct views. Initial details of the environmental offsets to features are detailed within the Scoping Commitments Register (**Appendix B**).
- 3.3.43. Existing Public Rights of Way (PRoW) within and in proximity to the Site boundary are distinct in that many follow ancient sea walls that are raised within the landscape, forming clear field boundaries. The existing PRoWs within the Site boundary would be retained and incorporated into the design of the Proposed Development. There may be the need for temporary closures and/or diversions during construction and decommissioning, but these would be kept to a minimum. Where possible and practicable, Permissive Paths would be included to improve recreational connectivity.
- 3.3.44. As shown in **Appendix D**, areas for biodiversity and landscape enhancement have been identified; these areas are indicative at this stage and would be further developed through the results of ecology surveys, and consultation and engagement with relevant consultees. There may also be potential for ecological compensation given the context of the Site boundary proximity to sensitive ecological designations. The impacts identified and approach taken to mitigation would be discussed and determined with Natural England and the Environment Agency, which would be further documented within the ES. Further details at this stage are presented in sections 6.4.6 to 6.4.12 of **Chapter 6: Biodiversity**.
- 3.3.45. The Proposed Development would achieve a Biodiversity Net Gain in excess of 10%, with details on how this is to be achieved provided as part of the DCO application.
- 3.3.46. An Outline Landscape and Ecology Management Plan (oLEMP) would also be submitted as part of the DCO Application (see further details below).

Construction Phase of the Proposed Development

Programme and Activities

- 3.3.47. At this stage it is anticipated that the construction phase would be approximately two to three years, with an anticipated connection date of 2031¹³. Further construction details would be provided as part of the DCO application.
- 3.3.48. Construction activities would include but are not limited to:

¹³ The precise connection date is subject to change upon receipt of the formal Gate 2 offer from NESO.

- Site preparation and clearance, advanced planting works;
- Haul roads and temporary access establishment;
- Transportation of construction materials, plant and equipment;
- Set up of temporary construction site compounds, offices and welfare and storage facilities;
- Construction of fencing and security measures;
- Targeted site clearance, earthworks and excavations;
- Construction of crossing points across ditches within the Site boundary;
- Works for drainage systems, services and utilities;
- Laying down of access tracks, ramps, footpaths and roads;
- Assembling Solar PV module mounting structures and modules;
- Installation of DC and AC electrical cables, substation, BoSS, transformers;
- Testing and commissioning of electrical components;
- Installation of HV cabling from the solar farm to the National Grid substation;
- Connection and integration of the solar farm to the National Grid Network; and
- Landscaping and habitat enhancement.

3.3.49. No demolition works are currently proposed.

Temporary Construction Site Compounds

3.3.50. There would be the requirement for main construction compounds and satellite construction compounds to facilitate the construction of the Proposed Development. The precise dimensions and location of compounds would be determined at a later design stage; however, the typical footprint of a main compound is 25,000m², and satellite compounds have a typical footprint of 1,250m². Stored equipment and material would be a maximum of 3.5m above ground level.

3.3.51. The location of the temporary construction site compounds, which would consider technical and environmental aspects, as well as feedback from consultation and engagement, would be provided as part of the DCO application information. Indicative locations would be provided as part of Phase Two consultation.

Construction Traffic and Site Access

3.3.52. Precise construction and decommissioning access routes have not been determined at this stage and are not considered within the Scoping Report. The construction and decommissioning access points would be up to 7m wide, depending on traffic requirements, with lane width adjustments at bends assessed on a case-by-case basis using vehicle swept path analysis.

Permanent access roads for operation would range from 3.5m to 6m wide, with similar assessments for bends. Entry splays for solar and substation access would follow local road authority requirements. The precise location of access points would be confirmed at later design phases. However, where possible, existing field access points would be utilised.

- 3.3.53. Access tracks would be constructed using, compacted earth, hardcore or gravel over a levelling layer of subbase, trackpad covered ground, or existing metalled surfaces, depending on ground conditions and archaeological constraints. Ditch crossings for access tracks, fences, and cable routes would be upgraded or newly constructed as needed. Underground utilities affected by access works would be identified and protected during construction.
- 3.3.54. Consultation and engagement would be undertaken with National Highways and the Kent County Council (KCC) and East Sussex County Council (ESCC) highways teams to inform the precise access design and locations.
- 3.3.55. Where large scale High Voltage (HV) component loads are required for the electrical grid connection, these would be delivered as Abnormal Indivisible Loads (AIL). The AIL assessment would include detailed swept path analyses for the main constraint points on the route from the nearest suitable trunk road junction through to the proposed on-site substation access junction. This is to demonstrate that components can be delivered to the Proposed Development and to identify any temporary road works which may be necessary, as well as identifying any additional temporary oversailing rights that might be needed. A Route Survey Report describing the route and the proposed operational management of the deliveries would be submitted as part of the DCO application, alongside the outline Construction Traffic Management Plan (oCTMP) and Operational Traffic Management Plan (OTMP).

Environmental Management

- 3.3.56. As part of the DCO submission, the following outline management plans would be submitted which would detail the environmental measures to be included in the detailed management plans that would be implemented during construction of the Proposed Development. The use of these management plans is detailed within the Scoping Commitments Register (**Appendix B**). Where applicable, the Scoping Commitments Register also includes any environmental aspect specific measures which the Applicant would implement as part of the management plans, to ensure no likely significant effects would occur.
- 3.3.57. The construction management plans would include:
- Outline Construction Environmental Management Plan (oCEMP), which would set out site-specific procedures and mitigation measures to monitor and control environmental impacts throughout the construction phase of the Proposed Development;

- Outline Construction Traffic Management Plan (oCTMP), which would propose how construction traffic, including site personnel movements, would be controlled safely by the Applicant and its sub-contractors;
- Outline Soils Management Plan (oSMP) which would manage any potential impacts to the soil (and agricultural land) during and on completion of the Proposed Development. It would set out further information on the areas which may be more susceptible to damage, and would further set out measures for soil management;
- Outline Employment Skills and Supply Chain Management Plan (oESSMP), setting out measures to maximise opportunities to promote economic benefits in relation to skills, supply chains, and employment in the local region, which is required to deliver the entirety of the Proposed Development;
- Outline Site Waste Management Plan (oSWMP), setting out the standard good practice measures that would be implemented by the Applicant to manage waste generated by the construction of the Proposed Development; and
- Outline Public Right of Way Management Plan (oPRoWMP) which would outline how PRoW would be managed for the Proposed Development to ensure they have been considered fully and are able to operate during construction, operation and decommissioning. The oPRoWMP would also detail any temporary diversions or closures which may be required during construction and decommissioning.

3.4. Operational Phase of the Proposed Development

Programme and Activities

- 3.4.1. It is anticipated that the Proposed Development would become operational in 2031¹³ in line with the current grid connection date, and could remain in operation for up to 60 years. During the operational phase of the Proposed Development, onsite activities would include routine servicing, maintenance and replacement of plant and equipment. An assessment of the replacement of solar equipment would be included in the environmental aspect chapters and detailed within the Environmental Statement (ES) submitted as part of the DCO application. Other maintenance works may include management of access tracks and vegetation. At this stage the use of animal grazing within the Proposed Development is still being considered.

Environmental Management

- 3.4.2. During operation, the Proposed Development would be subject to the environmental management plans, outline versions of which would be submitted as part of the DCO application. The use of these management plans is detailed within the Scoping Commitments Register (**Appendix B**). Where applicable, the Scoping Commitments Register also includes any environmental aspect specific measures which the Applicant would implement as part of the management plans, to ensure no likely significant effects would occur.

3.4.3. The operational management plans would include:

- Outline Operational Environmental Management Plan (oOEMP), setting out measures to manage environmental impacts during the operational phase of the development and ensuring compliance;
- The oLEMP would set out the short and long-term measures and practices that would be implemented to establish, monitor, and manage landscape and ecology mitigation and enhancement measures embedded in the design of the Proposed Development;
- Outline Soils Management Plan (oSMP) which, as above, would manage potential impacts to the soil (and agricultural land) during and on completion of the Proposed Development (considering the construction, decommissioning and operational phases);
- Outline Site Waste Management Plan (oSWMP) setting out the standard good practice measures that would be implemented by the Applicant to manage waste generated by the operation of the Proposed Development;
- Outline Employment Skills and Supply Chain Management Plan (oESSCMP) setting out measures to maximise opportunities to promote economic benefits in relation to skills, supply chains, and employment in the local region, which is required to deliver the entirety of the Proposed Development; and
- Outline Battery Safety Management Plan (oBSMP) setting out measures to account for potential safety risks, and the mitigation and management procedures to ensure that all safety concerns are addressed in so far as is reasonably practicable.

3.5. Decommissioning Phase of the Proposed Development

Programme and Activities

- 3.5.1. After up to 60 years of operation, decommissioning would commence. The Site would be returned to its original use as far as possible and practical, with areas of established mitigation left in-situ where possible and in agreement with the landowners. Concrete, hardstanding areas, foundations for the infrastructure and any internal tracks would be removed to a depth of up to 1m, and would be dismantled and recycled or disposed of in accordance with best practice policy and requirements at that time. Typically, any underground cabling below 1.5m would be left in-situ, unless otherwise agreed with the landowner provided that in each case the tenant shall leave any such equipment in a safe condition. This would also be dependent upon the legislation and industry standards at the time of decommissioning. The use of decommissioned materials would follow the waste hierarchy such that they would be reused where possible before recycling and disposal were considered.

Environmental Management

3.5.2. During decommissioning the Proposed Development would be subject to the following environmental management plans, outline versions of which would be submitted as part of the DCO application. The use of these management plans is detailed within the Scoping Commitments Register (**Appendix B**). Where applicable, the Scoping Commitments Register also includes any environmental aspect specific measures which the Applicant would implement as part of the management plans, to ensure no likely significant effects would occur.

3.5.3. The decommissioning management plans would include:

- Outline Decommissioning Environmental Management Plan (oDEMP) which would set out the principal decommissioning activities and the measures that would be implemented, so far as is practical, to ensure the works do not adversely impact amenity, traffic or the environment in the surrounding area;
- Outline Soils Management Plan (oSMP) as above would manage any potential impacts to the soil (and agricultural land) during and on completion of the Proposed Development (considering the construction, decommissioning and operational phases);
- Outline Site Waste Management Plan (oSWMP) setting out the standard good practice measures that would be implemented by the Applicant to manage waste generated by the decommissioning phase of the Proposed Development; and
- Outline Employment Skills and Supply Chain Management Plan (oESSCMP), which as above, sets out measures to maximise opportunities to promote economic benefits in relation to skills, supply chains, and employment in the local region, which is required to deliver the entirety of the Proposed Development.

3.6. Opportunities for Collaboration

3.6.1. The Applicant is aware of two other NSIP scale solar projects which are also proposed in the vicinity of South Brooks. Where practicable, the Applicant would explore opportunities to collaborate with other developers to reduce environmental effects. This could include, for example, traffic management or overlapping elements within proposed Works Plans. If required, a Joint Report on Interrelationships would be submitted as part of the DCO application, to provide further information on any agreed collaboration between developers.

4. Planning Policy Context

4.1. Introduction

- 4.1.1. An overview of national, regional and local planning policy relevant to informing the scope of the Environmental Impact Assessment (EIA) is provided within this Chapter. Further information on planning policy where it is specific to a particular technical aspect, is provided within the aspect chapters themselves (see **Chapters 6 to 19**).
- 4.1.2. A review of relevant policy would be included within the Environmental Statement (ES). Although planning policy would have often informed the assessment of effects as detailed within the ES, in particular helping to inform whether an effect is significant or not, compliance of the Proposed Development with relevant planning policies would not be undertaken within the ES but would be set out in the Planning Statement which would also accompany the Development Consent Order DCO application.

4.2. Planning Act 2008

- 4.2.1. The Proposed Development constitutes a Nationally Significant Infrastructure Project (NSIP), in accordance with the Planning Act 2008¹⁴, as it comprises:
- The construction or extension of a generating station (Part 3, Section 14(1)(a)); and
 - Its capacity is more than 50MW (Part 3, Section 15(2)(l))¹⁵.
- 4.2.2. Therefore, a DCO application under the Planning Act 2008 is required to be made to the Secretary of State for Energy Security and Net Zero (DESNZ), who would then issue a decision following examination of the application by an Examining Authority.
- 4.2.3. Under Section 104(2) of the Planning Act 2008, the Secretary of State is required to consider any relevant National Policy Statement (NPS) when deciding whether to grant a DCO and must decide the application in accordance with any relevant national policy statement, except to the extent that one or more of the exceptions in subsections (4) to (8) applies. Under the Planning Act 2008 regime, NPSs provide the policy framework from which the Secretary of State examines and makes its decision in relation to NSIP applications. National policy is set out in relation to key types of NSIPs identified in Section 14 of the Planning Act 2008.

¹⁴ UK Government (2008). *Planning Act 2008*. [Online]. Available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents>

¹⁵ This threshold, at which potential solar developments are classified as an NSIP, would rise from 50MW to 100MW from the 31st December 2025, as part of the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025

4.2.4. For the purpose of Section 104(2)(a), the following NPSs have effect in relation to the Proposed Development:

- Overarching NPS for Energy (EN-1)¹⁶;
- NPS for Renewable Energy Infrastructure (EN-3)¹⁷; and
- NPS for Electricity Networks Infrastructure (EN-5)¹⁸.

4.2.5. An overview of the current and draft NPSs that would be considered from a planning policy perspective as part of undertaking the EIA are set out below.

4.3. National Policy Statement for Energy (EN-1)

4.3.1. The Overarching NPS for Energy (EN-1), adopted by the Department of Energy and Climate Change (DECC) in July 2011, and updated in 2023, sets out the national policy for delivering major energy infrastructure in England and Wales. The NPS has effect in combination with the relevant technology specific NPS, National Policy for Renewable Energy Infrastructure (EN-3), and together they provide the primary basis for the Examining Authority's recommendation to the Secretary of State and decisions made by the Secretary of State to grant or refuse Development Consent.

4.3.2. Part 3 of EN-1 identifies the need that exists for nationally significant energy infrastructure. With regards to decision making, paragraph 3.1.1 of EN-1 sets out how the NPS "*explains why the government sees a need for significant amounts of new large-scale energy infrastructure to meet its energy objectives and why the government considers that the need for such infrastructure is urgent*".

4.3.3. Applicable to the Proposed Development Paragraph 3.3.21 of the EN-1 states "*a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar*".

4.3.4. Paragraph 3.3.24 states that "*Applications for...solar above 50MW in England, or 350MW ... in Wales, would continue to be defined as NSIPs, requiring consent from the Secretary of State (see EN-3)*".

4.3.5. Paragraph 3.3.22 notes that renewable energy sources, such as solar, are intermittent and, as a result, need to be complemented with technologies which supply electricity or reduce demand when the availability of intermittent renewable sources is low. Paragraph 3.3.28 goes on to identify how electrical

¹⁶ Department of Energy and Climate Change (2024) Overarching National Policy Statement for Energy 2023 (NPS EN-1)

¹⁷ Department of Energy and Climate Change (2024) Overarching National Policy Statement for Energy 2023 (NPS EN-3)

¹⁸ Department of Energy and Climate Change (2024) National Policy Statement for Electricity Networks Infrastructure 2023 (NPS EN-5) (designated in January 2024)

storage technologies can be used to compensate for intermittence but do have limitations.

- 4.3.6. Paragraph 4.1.5 of the NPS EN-1 states that in considering any proposed development, and when weighing its adverse impacts against its benefits, the Secretary of State should consider:
- *“its potential benefits including its contribution to meeting the need for energy infrastructure, job creation, reduction of geographical disparities, environmental enhancements, and any long-term or wider benefits*
 - *its potential adverse impacts, including on the environment, and including any long-term and cumulative adverse impacts, as well as any measures to avoid, reduce, mitigate or compensate for any adverse impacts, following the mitigation hierarchy.”*
- 4.3.7. Section 4.3 of the NPS EN-1 is related to the requirement for assessment of likely significant environmental effects and reporting within an Environmental Statement for projects.
- 4.3.8. Paragraph 4.3.4 of NPS EN-1 states that: *“to consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.”*
- 4.3.9. Paragraph 4.3.5 continues: *“for the purposes of this NPS and the technology specific NPSs the ES should cover the environmental, social and economic effects arising from pre-construction, construction, operation and decommissioning of the project.”*
- 4.3.10. Where relevant, the EIA process would take into account the requirements of the relevant NPSs.
- 4.3.11. When weighing a project’s impacts against its benefits, Paragraph 4.1.6 of the NPS EN-1 sets out that the Secretary of State should take into account *“environmental, social and economic benefits and adverse impacts, at national, regional and local levels. These may be identified in this NPS, the relevant technology specific NPS, in the application or elsewhere (including in local impact reports, marine plans, and other material considerations as outlined in Section 1.1).”*
- 4.3.12. Paragraph 4.3.10 states that *“the applicant must provide information proportionate to the scale of the project, ensuring the information is sufficient to meet the requirements of the EIA Regulations.”* At paragraph 4.3.12 in NPS EN-1 states *“where some details are still to be finalised, the ES should, to the best of the applicant’s knowledge, assess the likely worst-case environmental, social*

and economic effects of the proposed development to ensure that the impacts of the project as it may be constructed have been properly assessed.”

4.4. Draft National Policy Statement for Energy (EN-1)

- 4.4.1. In May 2025 the Department for Energy Security and Net Zero (DESNZ) published a consultation on revisions to NPS' EN-1, EN-3 (discussed below) and EN-5 (see below). Consultation on the material amendments to these draft NPSs was undertaken between April until May 2025.
- 4.4.2. NPS EN-1 has been revised to incorporate the Clean Power Action Plan 2030¹⁹ into the section that previously focused on Net Zero. This change highlights the Plan as the central policy that the NPSs are designed to support. Introduced in December 2024, the Clean Power Action Plan sets a target for at least 95% of the UK's electricity to come from clean sources by 2030. Applicable to the Proposed Development, to meet this goal, the Department for Energy Security and Net Zero (DESNZ) has defined capacity targets of 45 – 47 GW for solar.
- 4.4.3. Section 4.2 of the draft NPS EN-1 statement brings projects relevant under the Clean Power Action Plan into the remit of critical national priority (CNP), which gives them a presumption in favour of consent. Introduced in 2024, the CNP policy significantly reduces the likelihood of consent being refused due to residual impacts that remain after the mitigation hierarchy has been applied. It enables the Secretary of State (SoS) to give due weight to the strategic importance of low-carbon infrastructure when making planning decisions.
- 4.4.4. Section 1.3 of the draft NPS EN-1, “*Scope of the Overarching National Policy Statement for Energy*,” specifies that once the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 comes into force, it would cover onshore wind and solar generating stations in England only where their capacity exceeds 100MW. Section 3.3.24 of the draft NPS EN-1 also reaffirms the UK Government's publication of the Department for Energy Security and Net Zero's 'Clean Power Capacity Range' in the Clean Power Action Plan 2030, which outlines a target range of 45– 47GW for solar capacity.

4.5. National Policy Statement for Renewable Energy Infrastructure (EN-3)

- 4.5.1. The NPS for Renewable Energy Infrastructure (EN-3), published by DECC in July 2011, and updated in December 2024 with further updates in February 2025, taken together with the Overarching NPS for Energy (EN-1), provides the primary basis for the Examining Authority's recommendation to the Secretary of

¹⁹ Department for Energy Security and Net Zero (2024) Clean Power 2030 Action Plan: A New Era of Clean Electricity.
Available at: assets.publishing.service.gov.uk/media/677bc80399c93b7286a396d6/clean-power-2030-action-plan-main-report.pdf

State and decisions made by the Secretary of State to grant or refuse Development Consent.

- 4.5.2. The importance of generation of electricity from renewable sources is stated at Paragraph 1.1.2 of NPS EN-3: *“electricity generation from renewable sources is an essential element of the transition to net zero and meeting our statutory targets for the sixth carbon budget (CB6). Our analysis suggests that demand for electricity is likely to increase significantly over the coming years and could more than double by 2050. This could require a fourfold increase in low carbon electricity generation, with most of this likely to come from renewables.”*
- 4.5.3. Section 2.10 of NPS EN-3 sets out assessment and technology specific information relating to solar photovoltaic generation. Paragraph 2.10.9 confirms *“the government has committed to sustained growth in solar capacity to ensure that we are on a pathway that allows us to meet net zero emissions by 2050. As such, solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector.”*
- 4.5.4. In terms of site layout, design and appearance Paragraph 2.10.60 of NPS EN-3 states: *“applicants would consider several factors when considering the design and layout of sites, including proximity to available grid capacity to accommodate the scale of generation, orientation, topography, previous land–use, and ability to mitigate environmental impacts and flood risk.”*
- 4.5.5. EN-3 sets out information that should be provided on relevant impacts, including but not limited to biodiversity and ecological conservation; landscape, visual and residential amenity; glint and glare; cultural heritage; construction including traffic and transport noise and vibration.
- 4.6. **Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)**
- 4.6.1. Section 2.10 of draft NPS EN-3 provides detailed guidance on what solar photovoltaic generation proposals may consist of and how they should be assessed. Paragraph 2.10.7 to 2.10.9 states:
- “Solar farm proposals are currently likely to consist of solar panel arrays, mounting structures, piles, inverters, transformers and cables.*
- Associated infrastructure may also be proposed and may be treated, on a case-by-case basis, as associated development, such as energy storage, electrolyzers associated with the production of low carbon hydrogen, or security arrangements (which may encompass flood defences, fencing, lighting and surveillance).*
- Along with associated infrastructure, a solar farm requires between 2 to 4 acres for each MW of output. A typical 50MW solar farm would consist of around 100,000 to 150,000 panels and cover between 125 to 200 acres. However, this would vary significantly depending on the site, with some being larger and some*

being smaller. This is also expected to change over time as the technology continues to evolve to become more efficient. Nevertheless, this scale of development would inevitably have impacts, particularly if sited in rural areas.”

- 4.6.2. With regards to environmental considerations, Draft NPS EN-3 states the following impacts should be considered: Biodiversity, ecological, geological conservation and water management; landscape, visual and residential amenity; glint and glare; historic environment; and construction including traffic and transport noise and vibration.
- 4.6.3. Regarding impacts on water management, paragraph 2.10.146 of Draft NPS EN-3 states *“Water management is a critical component of site design for ground mount solar plants. Where previous management of the site has involved intensive agricultural practice, solar sites can deliver significant ecosystem services value in the form of drainage, flood attenuation, natural wetland habitat, and water quality management.”* In addition, with regards to Peat, paragraph 2.10.148 of Draft NPS EN-3 states *“Where developments are proposed on peat, to ensure the development would result in minimal disruption to the ecology, or release of CO₂, and that the carbon balance savings of the scheme are maximised, the Secretary of State should be satisfied that the solar farm layout and construction methods have been designed to minimise soil disturbance and other peatland impacts during construction and maintenance of roads, tracks, and other infrastructure and where possible are compatible with raised water table management.”*

4.7. National Policy Statement for Electricity Networks Infrastructure (EN-5)

- 4.7.1. The NPS for Electricity Networks Infrastructure (EN-5) was published by the DECC in July 2011, and updated in November 2023, and forms part of the suite of energy NPSs and is to be read in conjunction with the Overarching NPS for Energy (EN-1).
- 4.7.2. NPS EN-5 is relevant to the Proposed Development as the Proposed Development falls within the two main elements of the policy captured at paragraph 1.6.1 set out below:
- *“transmission systems (the long-distance transfer of electricity through 400kV and 275kV lines), and distribution systems (lower voltage lines from 132kV to 230V from transmission substations to the end-user) which can either be carried on towers/monopoles, or underground; and associated infrastructure, e.g. substations (the essential link between generation, transmission,*
 - *and the distribution systems that also allows circuits to be switched or voltage transformed to a useable level for the consumer) and converter stations to convert DC power to AC power and vice versa. These are particularly relevant to the conversion of long-distance offshore DC transmission to AC, when it arrives onshore for distribution.”*

- 4.7.3. The policy statement recognises that new electricity networks required for electricity generation, storage and interconnection infrastructure are vital to achieving the nation's transition to net zero.
- 4.7.4. NPS EN-5 sets out further technology-specific considerations, in addition to those impacts covered in NPS EN-1, for: Biodiversity and Geological Conservation; Landscape and Visual; Noise and Vibration; and electromagnetic frequencies (EMFs).
- 4.7.5. With regards to cable routing NPS EN-5 states *“the applicant should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process.”*

4.8. National Planning Policy

- 4.8.1. The National Planning Policy Framework (2024)²⁰ (NPPF) sets out the government's planning policies for England and how these are expected to be applied. The NPPF does not contain specific policies for NSIPs as these are determined in accordance with the decision-making framework in the Planning Act 2008 and any relevant NPSs, but it still can be an important and relevant matter for the purposes of the Secretary of State's decision making when determining the DCO application.
- 4.8.2. The NPPF also provides relevant context for individual assessment topics.
- 4.8.3. The paragraphs of particular relevance to the application are as follows:
- Paragraph 8: *“achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
 - a) *an economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current*

²⁰ Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*. [Online]. [Accessed: 19 March 2025]. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

and future needs and support communities' health, social and cultural well-being; and

- c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*
- Paragraph 165: *“to help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts)”*
- Paragraph 168: “When determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should:
 - d) not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future;*
 - e) recognise that small-scale and community-led projects provide a valuable contribution to cutting greenhouse gas emissions”.*

Local Planning Policy

- 4.8.4. The relevant Local Development Plans for the area do not carry the same weight under the Planning Act 2008 in respect of decision making on NSIPs, as they do with determining planning applications under the Town Country Planning Act 1990. The NPSs are the primary consideration for NSIP applications. Nevertheless, the Development Plan is still a matter which can be considered important and relevant in deciding an application for a DCO, although in the event of any conflict, the NPS prevails.
- 4.8.5. The Proposed Development is primarily located in the administrative area of Folkestone and Hythe District Council, and of Kent County Council. The Proposed Development is also partially located within the administrative area of Rother District Council, and of East Sussex County Council. The relevant Local Planning Policies of the adopted development plans for each of the 'host' planning authorities would be considered as part of the assessment.

Folkestone and Hythe District Council Places and Policies Local Plan (2020)

4.8.6. On 16th September 2020, the Folkestone and Hythe District Council adopted the Places & Policies Local Plan²¹. The Places & Policies Local Plan includes policies that guide investment and development, while safeguarding the natural/historic environment, enabling adaptation to climate change; and helping to secure high-quality design.

4.8.7. Relevant to the Proposed Development, Policy CC6, Solar Farms, States:

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

- *The proposal does not have an adverse impact on the landscape character or have any adverse visual impact on the scenic beauty of the Kent Downs Area of Outstanding Natural Beauty, other sensitive local landscapes or heritage assets;*
- *The proposal does not result in the direct loss of amenity to nearby residential properties by virtue of glare or other disturbance;*
- *Any necessary ancillary building works are minimised so as not to adversely impact on the character of the surrounding area;*
- *There are no adverse ecology impacts arising from the development;*
- *A suitable landscaping and screening strategy is included with the application;*
- *The solar panels and supporting frames are finished in an appropriate colour to minimise visual impact;*
- *The solar panels are removed when no longer operational;*
- *The consideration of the need for and impact of, security measures such as lights and fencing, are included in the application;*
- *The proposal clearly indicates the installed capacity (MW) of the proposed facility; and*
- *The solar farm would not result in the loss of the best and most versatile agricultural land.*

4.8.8. The new local plan for Folkestone and Hythe District Council is beginning its scoping and early participation, this being between July and October 2025, with the new local plan expected to be adopted in October 2027²².

Rother District Council Local Plan Adopted Core Strategy (2011-2028)

²¹ Folkestone & Hythe District Council (2020). Places & Policies Local Plan. [Online] [Accessed: 15/07/2025] Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

²² Folkestone & Hythe District Council (2025). Local Plan Timetable March 2025. [Online] [Accessed: 15/07/2025] Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/5778/folkestone-hythe-district-council-local-plan-timetable-2025>

4.8.9. On the 29th September 2014, Rother District Council adopted the Local Plan Core Strategy²³. The Core Strategy aims to provide contributions toward sustainable development, setting out policies that address the need to deliver homes in the local area, as well as supporting other development and infrastructure. Core policies are included which address localised issues in relation to community development, the economy, the environment, and transport.

4.8.10. Relevant to the Proposed Development, Policy SRM1, Towards a low carbon future, states:

The Strategy to mitigate and adapt to the impacts of climate change is to:

- *(iii) Support stand-alone renewable and low carbon energy generation schemes, particularly those utilising solar, biomass and wind energy technologies, that:*
 - *(a) do not have a significant adverse impact on local amenities, ecological and heritage assets or landscape character; and*
 - *(b) in respect of locations in or adjacent to the High Weald AONB and other sensitive landscapes, are generally small in scale.*

Rother District Council Draft Local Plan (2020-2040)

4.8.11. Rother District Council are currently preparing a new Local Plan to cover the period from 2020-2040. The initial Regulation 18 consultation on this draft plan was held between April and July 2024. Following the publication of the most recent National Planning Policy Framework, a revised timetable was set out by Rother District Council in order to submit the revised local plan. Rother District Council aim to submit the revised local plan to the Government for public examination in December 2026.

4.8.12. Within the Draft (Regulation 18) Version of the Local Plan dated April 2024, Policy GTC6, Renewable and Low Carbon Energy, states that:

Solar:

- *Proposals for roof-mounted solar energy supply infrastructure would be supported and encouraged wherever possible, subject to other policies and Policy HER1 (Heritage Management) in particular. Stand-alone ground mounted installations would be supported, subject to other policies, on previously developed land or where evidence of community support can be demonstrated.*

Energy Storage:

²³ Rother District Council (2014). *Rother Local Plan Core Strategy 2011 to 2028*. [Online] [Accessed 01/10/2025] Available at: <https://rdcpublish.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

- *Proposals for energy storage would be supported. Subject to other policies, where it is co-located with an existing or proposed renewable energy development or can be shown to alleviate grid constraints.*

4.8.13. Explanatory text relating to Policy GTC6, Renewable and Low Carbon Energy, states that: “Stand-alone ground mounted solar installation opportunities are limited within the district, however a policy that supports suitable schemes in appropriate sustainable locations, with community support is necessary.”

5. Approach to EIA

5.1. Introduction

- 5.1.1. This chapter sets out the overall approach that would be taken to the Environmental Impact Assessment (EIA) for the Proposed Development. The Environmental Statement (ES) would contain the information specified in Schedule 4²⁴ of the EIA Regulations. The approach to the assessment has been informed by current best practice guidance.
- 5.1.2. An overview of the guidance and methodology adopted for each environmental aspect is provided within the respective environmental chapters of this EIA Scoping Report.

5.2. The EIA Process

- 5.2.1. In accordance with Regulation 14(3) of and Schedule 4 to the EIA Regulations²⁵, the EIA process would be set out in an ES, which would describe:
- the Proposed Development;
 - provide an EIA methodology as well as technical methodologies and data used in support of the assessment;
 - mitigation and enhancement measures including monitoring arrangements;
 - the assessment of likely significant environmental effects; and
 - present the residual effects and an assessment of cumulative effects.
- 5.2.2. The ES would be prepared in accordance with relevant planning policy and guidance; Planning Inspectorate (PINS) Advice Note Seven²⁶; and current best-practice EIA guidelines, including the latest relevant technical advice notes from PINS. The EIA process would follow guidance included in technical advice notes referred to as part of the EIA Scoping Report, and includes (but is not limited to) the following:
- PINS Advice Note Three²⁷;

²⁴ His Majesty's Government 2017 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Schedule 4) [Online] available at: <https://www.legislation.gov.uk/uksi/2017/571/schedule/4>

²⁵ His Majesty's Office (HMSO) (2017) Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

²⁶ The Planning Inspectorate (2020). Annex to Advice Note 7 – Presentation of the Environmental Statement. [Online]. Available at:

https://assets.publishing.service.gov.uk/media/6579a3e4095987001295dfcc/Annex1_advice_note_7.pdf

²⁷ The Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: Advice on EIA Notification and Consultation. [Online]. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-eia-notification-and-consultation#who-should-be-consulted>

- PINS Advice Note Ten²⁸; and
- PINS Advice Note Eleven²⁹.

5.2.3. Each technical assessment of the ES would be assessed in line with specific technical methodologies and best-practice guidelines, to which further detail is presented in section 5.12.

5.2.4. The EIA process has also been informed by consultation with statutory consultees, interested parties and members of the public. The overarching purpose of the EIA process is to ensure that decision makers can make an informed judgement upon the potential environmental impacts of the Proposed Development.

5.3. Rochdale Envelope

5.3.1. The Rochdale Envelope is a recognised way of dealing with an application comprising EIA development where details of a project have not been fully resolved by the time the application is submitted. This means that maximum and minimum design envelopes would be adopted to provide sufficient flexibility for the later detailed design of the Proposed Development (detailed design would take place post granting of the DCO and would be subject to a requirement in the DCO, for details to be approved by the relevant authority), whilst also allowing for a robust assessment of environmental effects (this assessment being based on maximum 'worst case' parameters) to be made.

5.3.2. To comply with the EIA Regulations, and to provide certainty to stakeholders such as the local community, it is crucial to define these parameters as narrowly as possible to accurately identify likely significant effects rather than exaggerating effects that are improbable.

5.3.3. The Environmental Statement (ES) would clearly explain which elements of the Proposed Development are yet to be finalised and provide reasons for this. Where flexibility is sought for any elements, the ES would set out the construction and design parameters and the works that would be involved for each of the parcels comprising the Proposed Development. With this in mind, the EIA would ensure a clear understanding of assumptions and cumulative construction impacts to represent a 'worst case', ensuring a robust assessment of the likely significant environmental effects. In addition to the Rochdale Envelope, following PINS Guidance to ensure clarity as to how environmental

²⁸ The Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments. [Online]. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-habitats-regulations-assessments>

²⁹ The Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: Advice on working with public bodies in the infrastructure planning process. [Online]. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-working-with-public-bodies-in-the-infrastructure-planning-process#summary-of-how-public-bodies-may-be-involved-at-each-stage-of-the-nsip-process>

mitigation measures included within the design of the Proposed Development are secured, a Commitments Register would be included within the DCO application. As discussed in **Chapter 1: Introduction**, this would identify how commitments would be secured and implemented, to ensure potential environmental effects arising from the Proposed Development are mitigated as far as possible, in accordance with the EIA mitigation hierarchy (as set out **Chapter 5: Approach to EIA**).

5.4. Constraints Analysis and Design Process

- 5.4.1. As part of the EIA and design process, all technical aspects would use the relevant environmental baseline conditions of the Site and its surrounds in order to identify any environmental constraints and opportunities relevant to each of the technical aspect assessments. Where relevant this includes the future baseline, which is where a change is anticipated to the baseline over the lifetime of the Proposed Development, assuming the Proposed Development did not proceed. This enables design principles to be created to support the evolution of the Proposed Development, to help ensure that important environmental considerations are taken into account during the design development process. The outputs from this process would be included within the ES.

5.5. Consultation

- 5.5.1. A continuous programme of engagement would be undertaken in parallel with, and complementary to, formal phases of pre-application consultation for the Proposed Development. The distinction between consultation and engagement are as follows:
- Engagement relates to discussions between the Applicant, community and stakeholders outside formal phases of consultation.
 - Consultation relates to the formal stages of non-statutory and statutory consultation.
- 5.5.2. Sections 42, 47 and 48 of the Planning Act 2008³⁰ and Regulation 13 of the EIA Regulations³¹ currently require that certain statutory bodies, stakeholder groups and relevant land interests must be consulted as part of the pre-application process.
- 5.5.3. Consultation alongside the EIA process is critical to the development of a comprehensive and proportionate ES. The views of statutory and non-statutory consultees, including the local communities, environmental stakeholders,

³⁰ UK Government (2008). *Planning Act 2008*. [Online]. [Accessed: 18 March 2025]. Available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents>

³¹ His Majesty's Government (2017) The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 13) [Online] available at: <https://www.legislation.gov.uk/uksi/2017/571/regulation/13>

businesses, and landowners, are important to ensure that the EIA from the outset identifies specific issues where there are likely significant environmental effects, and where further investigation is required.

- 5.5.4. Engagement, as an ongoing process, enables mitigation measures to be incorporated into the Proposed Development to avoid, reduce and offset adverse environmental effects and to optimise environmental benefits. Early and ongoing engagement with consultees would continue to shape the design process of the Proposed Development. This ensures that comments are considered as part of the project design, and the project is developed in a way that is informed, transparent, and takes into account potential effects on the environment and local communities.
- 5.5.5. The consultation responses would be recorded in a Consultation Report, which would be submitted in support of the DCO application. Statements of Common Ground (SoCG) would also be submitted in support of the DCO application, which would detail any factual matters on which the Applicant and other interested parties agree upon, to ensure the efficiency of the examination process.
- 5.5.6. A number of amendments are proposed to the consultation provisions of the Planning Act 2008 under the Planning and Infrastructure Bill. Should any relevant changes take effect, these would inform the second phase of consultation anticipated to take place in early summer 2026.

Phase One Consultation

- 5.5.7. A period of consultation on the early plans and proposals for the Proposed Development (Phase One Consultation) took place between the 18th September 2025 and the 30th October 2025. The aim of the Phase One consultation was to:
- Introduce the Proposed Development to the local community, elected representatives, statutory consultees and identify other interested parties;
 - Provide an opportunity for anyone to understand, provide feedback on and influence early plans for the Proposed Development;
 - Gather high quality responses to, and feedback on, our plans to help inform proposals ahead of statutory consultation; and
 - Develop an approach to and understand preferences for pre-application consultation and engagement.
- 5.5.8. All responses received during consultation are being carefully considered and would inform the evolving design of the Proposed Development. The consultation responses would be recorded in a Consultation Report which would be submitted as part of the DCO application.

Phase Two Consultation

- 5.5.9. In accordance with Sections 42 of the Planning Act 2008³⁰ and Regulation 13 of the EIA Regulations³¹, a statutory period of consultation on refined plans and proposals for the Proposed Development which would be held in early summer 2026. The aims of statutory consultation are to:
- Ensure thorough, open and transparent engagement and consultation on the proposals;
 - Provide sufficient opportunities for interested parties to understand, provide feedback and influence the plans;
 - Gather high quality responses to, and feedback on, the plans to help inform proposals ahead of submission of the DCO application; and
 - Deliver a consultation that meets the legal requirements and best practice for a DCO application.
- 5.5.10. With specific regard to environmental effects, there is currently a requirement under the EIA Regulations to publicise and consult on Preliminary Environmental Information (PEI) for the Proposed Development. Taking into account any relevant amendments that may take effect under the Planning and Infrastructure Bill, the Applicant intends to consult on further preliminary environmental assessment work as part of its Phase Two consultation.

Engagement to Date

- 5.5.11. Engagement with stakeholders is underway to provide an introduction to the Proposed Development, obtain baseline environmental data and discuss preliminary baseline survey methodologies with them. Statutory bodies engaged to date include:
- Kent County Council (KCC);
 - East Sussex County Council (ESCC);
 - Folkestone and Hythe District Council (FHDC);
 - Rother District Council (RDC);
 - Planning Inspectorate (PINS);
 - Environment Agency (EA);
 - Natural England (NE); and
 - Kent Fire and Rescue Service.
- 5.5.12. Non-statutory bodies that have been engaged with to date include:
- The Royal Society for the Protection of Birds (RSPB);
 - Lydd Airport;
 - Kent Community Foundation;
 - Office for Nuclear Regulation;

- British Horse Society; and
- Developers and operators of proposed and existing energy generation including:
 - Shepway Energy Park;
 - South Kent Energy Park;
 - Little Cheyne Court Wind Farm; and
 - EDF Energy.

5.5.13. Further to the above, as part of the EIA process, consultation and engagement would be undertaken with a range of statutory and non-statutory consultees.

5.5.14. Details of specific technical engagement undertaken to date for each of the environmental aspects is provided in **Chapters 6 to 18** of this Scoping Report.

5.6. Defining the Study Area

5.6.1. Study areas have been defined individually for each environmental aspect, taking into account the geographic scope of the potential effects relevant to that aspect, aspect-specific guidance where available, and the information required to assess those effects. The proposed study areas are described within **Chapters 6 to 18** of this Scoping Report.

5.7. Baseline and Future Baseline

5.7.1. Appropriate and accurate baseline conditions (i.e. existing conditions on the Site and within its surroundings to an appropriately considered distance in the absence of the Proposed Development) need to be established in order to assess the likely significant environmental effects of the Proposed Development and to identify the most appropriate environmental measures to be employed to avoid or minimise any likely significant adverse effects.

5.7.2. Baseline information has been and would be collected and described by each technical aspect of the ES. This would include existing and available information within the public domain, baseline surveys undertaken as part of the EIA process and additional information provided as part of the consultation process and from engagement. For the majority of the environmental aspects, relevant baseline conditions would relate to the existing environmental conditions at the Site boundary and in the local area.

5.7.3. As required by Schedule 4(3) of the EIA Regulations, consideration would also be given to future baseline conditions, in particular how the baseline would likely change over the lifetime of the Proposed Development, but without the Proposed Development in place. The likely evolution of the baseline conditions would be described within each technical aspect chapter of the ES, with justification given as to why any change is assumed, and have also been

described, where currently known, in the aspect-specific Chapters (6 to 18) of this Scoping Report.

5.8. EIA Assessment of Development Phases

- 5.8.1. The ES would present the assessment of effects of the following phases of the Proposed Development:
- Construction Phase;
 - Operational Phase (including maintenance); and
 - Decommissioning Phase.
- 5.8.2. An indicative construction programme for the Proposed Development would be presented in the ES. This would include all stages of the construction including activities such as access works, site establishment, cabling works, solar PV array works and landscaping and habitat enhancement.
- 5.8.3. For the Construction Phase, the likely significant environmental effects of the Proposed Development would be assessed for the reasonable worst-case scenario for each technical aspect. For example, for transport this includes the peak in traffic when there are the maximum movements of vehicles on the local road network; for landscape and visual impacts and cultural heritage, this includes construction works at the closest proximity to a sensitive receptor. The reasonable assumptions made during the assessment would be detailed in the ES.
- 5.8.4. The EIA would assess the maximum development parameters (or the parameters that represent the reasonable worst case for likely significant environmental effects should that be different). The effects of the completed Proposed Development would be assessed and documented within the ES for the first full year of operation, or the year considered to be when maximum environmental effects occur (such as during maintenance relating to replacement of infrastructure). Each environmental aspect chapter would describe the worst-case year as appropriate. A further assessment scenario for the operational period where mitigation has been implemented would also be set out for relevant environmental topics including Landscape and Visual.
- 5.8.5. Within the ES there would also be an assessment made of the decommissioning phase of the Proposed Development. For the purposes of the EIA the decommissioning assessment would be based on an assumption that the Proposed Development would be operational for 60 years.
- 5.8.6. It is noted that, at the time that decommissioning would take place, the regulatory framework, good industry practices and the future baseline could have altered. Consequently, as detailed in **Chapter 3: The Proposed Development**, the Applicant would implement a Decommissioning and Environmental Management Plan (DEMP), which would be secured via a DCO

requirement that would set out the measures in place to manage likely significant effects as far as is reasonably practicable.

5.9. Prediction of Likely Effects and Determining Significance

- 5.9.1. Determining the potential for significant effects needs, generally, an aspect-specific approach and these methodologies are detailed within the aspect-specific chapters (see **Chapters 6 to 18**) themselves. However, there are certain common elements that occur in defining the appropriate scope for the detailed assessment.
- 5.9.2. Understanding the policy and legal position with regard to a specific environmental aspect is fundamental to determining likely significant effects. As such, the assessment of effects for every aspect would be informed by a detailed review of existing policy including that at national, regional and local level. In addition, relevant legal requirements would be identified.
- 5.9.3. Knowledge of the baseline environment specific to the technical aspect being considered is also required. At this scoping stage, the level of baseline collection is appropriate to allow the gaining of an understanding of whether the Proposed Development has the potential to cause significant effects. In many cases this means that there has been a reliance on desk study data. Therefore, in the future and to inform the detailed assessment as would be documented within the ES, further baseline data would be collected across the Proposed Development through detailed site surveys. Identification of sensitive receptors that could be affected by the Proposed Development would come from an analysis of this baseline data.
- 5.9.4. At this scoping stage, sensitive receptors have been identified and are noted within the aspect-specific chapters (see **Chapters 6 to 18**) albeit with the collection of more detailed baseline information, these may be subject to some change.
- 5.9.5. Establishing the potential for a significant effect to occur, and therefore which effects should be subject to detailed assessment, has been informed by aspect-specific guidance, including government technical advice notes and guidance validated by relevant professional bodies. The same approach would be used to inform the detailed assessment documented within the ES. Generally, reaching a conclusion on whether an effect could be significant requires consideration of the sensitivity of a receptor to change, and importantly consideration of the predicted magnitude of change.
- 5.9.6. Environmental measures (and mitigation) that would help to avoid or reduce the potential for an adverse significant effect to occur would be included as part of the Proposed Development wherever possible. In accordance with Schedule 4(7) of the EIA Regulations²⁵, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset likely significant effects. Specific environmental measures relevant to the technical aspects would be identified and would be considered as part of the assessments (i.e.

the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). To ensure clarity as to how the Environmental Measures are secured, a Commitments Register has been included within **Appendix B**. The Commitments Register is a 'live' document that would be updated throughout the planning process.

5.9.7. Summary of effect tables that summarise the likely significant effects associated with each of the environmental aspects would be provided in the ES at the end of each aspect assessment chapter. These tables would detail sensitive receptors, environmental measures and the likely significant effects. A distinction would be made between the following effects:

- direct;
- indirect;
- secondary;
- short-term, medium-term and long-term;
- permanent and temporary; and
- positive and negative effects.

5.9.8. Cumulative effects would be considered as a single coordinated assessment and would be presented as a separate ES Chapter.

5.10. Cumulative Effects

5.10.1. Schedule 4(5)(e) of the EIA Regulations³² states that the ES should include “a description of the likely significant effects of the development on the environment resulting from... the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources”.

5.10.2. Following the above screening criteria, the potential cumulative effects would follow the PINS Advice Note Seventeen³³ on cumulative effects assessment relevant to nationally significant infrastructure projects (NSIPs). The staged approach detailed in the Advice Note considers the level of certainty of surrounding projects, and the need to assess development plans and future development consents; acknowledging that there would be limited information available on the relevant proposals to base such assessment on.

³² His Majesty's Government (2017) The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Schedule 4) [Online] available at: <https://www.legislation.gov.uk/uksi/2017/571/schedule/4>

³³ The Planning Inspectorate (2025). Nationally Significant Infrastructure Projects: *Advice on Cumulative Effects Assessment*. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-cumulative-effects-assessment>

- 5.10.3. As outlined within the PINS Advice Note³³, the approach to cumulative effects assessment is split into four distinct phases:
- The establishment of a long list of development (Stage 1);
 - The establishment of a short list (Stage 2);
 - Information gathering (Stage 3); and
 - Cumulative assessment (Stage 4).
- 5.10.4. Stage 1 of the cumulative effects assessment would establish whether there are other existing and/or approved developments to be included within the assessment, as well as a quantification of the Zone of Influence (ZOI) for each environmental aspect scoped in for assessment. The current criteria for inclusion in the study, and to establish the long list of other existing and/or approved developments, are as follows:
- Other existing and/or approved projects within the local vicinity (at this stage assumed to be within 10km of the Proposed Development):
 - that have planning permission (or development consent) but are not yet built; or
 - schemes where a planning application (or DCO application) has been submitted but a decision not yet made; or
 - major projects likely to occur due to existing policy.
- 5.10.5. This information above would be identified based on information available on the local authorities planning registers, on the PINS website and discussed during the consultation stages. It should be recognised that many of the projects that would fall within the categories under the first two bullets above may be so small that cumulative effects would be highly unlikely. An example of this would be a house extension or similar. Using professional judgement, projects would therefore be screened for their potential to act in a cumulative way with the Proposed Development with only those where such potential exists considered further. This screening exercise would be detailed within the ES and would also be consulted upon as part of pre-application discussions with the relevant host authorities.
- 5.10.6. Stage 2 of the cumulative effects assessment includes the development of threshold criteria to the longlist as identified at Stage 1, to then establish a short list which would be included within the assessment within the ES. The criteria should address temporal scope as well as the scale and nature of the identified cumulative development.
- 5.10.7. To supplement the shortlist of cumulative developments identified at Stage 2, Stage 3 should gather all available information on each of the shortlisted developments to inform the Stage 4 assessment. This information should include, but not be limited to, design and locational information, any construction, operation and decommissioning information, as well as any

environmental data which could help inform the cumulative assessment, which may include baseline data and any potential environmental effects.

- 5.10.8. Stage 4 as outlined within the PINS Advice Note³³ is the assessment of cumulative effects of the Proposed Development with other developments identified within Stages 1 to 3 above and would be presented as a separate chapter of the ES. Each technical aspect of the ES would consider the potential for cumulative effects associated with the schemes identified (for example cumulative assessment of traffic effects from nearby projects that are of a significant scale (and where traffic flows are publicly available)).
- 5.10.9. Regulation 5(2) states that the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the Proposed Development on population and human health, biodiversity, land, soil, water, air and climate, material assets, cultural heritage and the landscape. Regulation 5(2)(e) refers to the need to assess 'the interaction between those factors'. The following types of cumulative effects would be considered in accordance with the EIA Regulations and best practice guidance:
- Combined effects: which occur when a similar type of effect, for example noise, occurs albeit from differing sources e.g. from both road traffic and aircraft noise. Within the ES, combined effects would be dealt with in the relevant technical aspect Chapter.
 - Interactive effects: which occur when a number of separate effects, for example noise and air quality, together interact to cause an effect on a particular receptor, for example a protected species. Interactive effects would be dealt with either in the relevant technical aspect Chapter of the ES (the example for protected species would be included in the Biodiversity Chapter), or where they have the potential to affect human health, then within the Human Health Chapter.

Cumulative Engagement

- 5.10.10. The Applicant is aware of two other NSIP scale solar projects which are also proposed in the vicinity of South Brooks. Where practicable, the Applicant would explore opportunities to collaborate with other developers to reduce environmental effects. This could include, for example, traffic management or overlapping elements within proposed Works Plans. If required, a Joint Report on Interrelationships would be submitted as part of the DCO application, to provide further information on any agreed collaboration between developers.

5.11. Transboundary Effects

- 5.11.1. Regulation 3(2) of the EIA Regulations²⁵ requires the consideration of any likely significant effects in the environment of another European Economic Area (EEA) member state. Guidance on the consideration of transboundary effects is

provided in the PINS' Advice 'Transboundary Impacts and Process'³⁴, updated in September 2024.

- 5.11.2. Due to the nature and location of Proposed Development, it is not anticipated that the Proposed Development has the potential to result in any likely significant effects on the environment of another European Economic Association (EEA) State. Therefore, a transboundary screening matrix has not been included within this EIA Scoping Report and transboundary effects are proposed to be scoped out of any future assessment.

5.12. Environmental Statement

- 5.12.1. In accordance with Schedule 4 (Regulation 18(3)) of the EIA Regulations²⁵ and PINS Advice Note Seven³⁵, the EIA process would be documented in an ES which would describe the Proposed Development, give full details of the EIA methodology and any technical methodologies and data used in support of the assessment; detail any mitigation, enhancement and compensation (if required) measures that have been employed; present the assessment of likely significant environmental effects; and provide a schedule of proposed mitigation and monitoring arrangements.
- 5.12.2. The ES would present an assessment of the cumulative effects and impact interactions as described in each of the relevant sections in **Chapters 6 to 18**.

ES Volume 1: Introductory Chapters

- 5.12.3. This Volume would comprise the main non-technical chapters of the ES, and would include the following:
- Introduction to the ES, including the structure of the ES, details on the aspect chapters, requirements of the EIA Regulations and the Technical Team Competency;
 - The overall methodology for this EIA, in terms of determining the significance of likely environmental effects;
 - Description of the proposed Order Limits (the geographical boundary which would be legally defined within the DCO) and surrounding area, including the main environmental features;

³⁴ The Planning Inspectorate (2024). *Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process*. [Online]. [Accessed: 18 August 2025]. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-transboundary-impacts-and-process>

³⁵ The Planning Inspectorate (2025). *Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements*. [Online]. [Accessed 18 August 2025]. Available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an>

- An outline of the main alternatives studied and an indication of the main reasons for the design of the Proposed Development as submitted, taking into account the environmental effects; and
- Description of the Proposed Development including the physical conditions and management during the construction, operation and decommissioning phases.

ES Volume 2: Aspect Chapters

5.12.4. This Volume would comprise the technical aspect chapters of the ES. This would include:

- A detailed assessment methodology for each environmental aspect scoped into the EIA;
- A description of the current baseline environment and an outline of the likely evolution thereof without implementation of the Proposed Development for each environmental aspect;
- A description of the embedded environmental measures proposed;
- An assessment of predicted environmental effects during the construction, operational and decommissioning phases;
- A description of the expected significant effects of the Proposed Development on the environment;
- An assessment of cumulative effects; and
- Summary of effects.

Volume 3: Figures and Technical Appendices Supporting ES Volumes 1 and 2

5.12.5. Volume 3 would include all the figures, and a separate volume would include all technical data required to support the assessment conclusions set out in Volume 2.

Non-Technical Summary

5.12.6. A Non-Technical Summary (NTS) would be prepared which would convey the key findings of the EIA in a clear and concise format (in non-technical language) to allow the public to understand the description of the Proposed Development, the significant effects likely to arise from the Proposed Development and the embedded environmental measures.

5.13. Environmental Aspects

5.13.1. Following a review of environmental surveys and preliminary appraisal work to date, it is proposed that the EIA need only to focus on the following environmental aspects where significant effects (both positive and negative) are

likely to occur. This includes the following technical aspects, which are discussed in **Chapters 6 to 16** and set out below:

- Biodiversity;
- Hydrology;
- Agricultural Soils;
- Archaeology;
- Built Heritage;
- Landscape and Visual;
- Transport and Access;
- Carbon and Climate Change;
- Noise and Vibration;
- Human Health; and
- Socioeconomics.

5.13.2. Scoped out matters relevant to each of the technical aspects listed above are dealt with in **Chapters 6 to 16**, with justifications provided. As outlined in **Chapter 17: Air Quality** and **Chapter 18: Land and Ground Water**, these aspects are proposed to be scoped out of the EIA, with justifications and details provided within the respective Chapters. Additional information is also provided within the Solar Scoping Table (**Appendix C**). Details on those aspects which are unlikely and/or not significant, and which have been scoped out of the EIA are included in **Chapter 19: Environmental Aspects Scoped Out of this Scoping Report**.

5.14. Habitats Regulations Assessment (HRA)

5.14.1. The Habitats Directive³⁶ is transposed into UK law under the Conservation of Habitats and Species Regulations 2017 (as amended)³⁷, which outlines that a HRA is required where:

- A plan or project has the potential to significantly affect a site designated for its nature conservation importance, including Special Areas of Conservation (SACs), as well as Special Protection Areas (SPAs) (National Site Network Sites (NSNS)³⁸).

³⁶ European Union, Council Directive 92/42/EEC (1992). Conservation of natural habitats and of wild fauna and flora. Available at : <https://www.legislation.gov.uk/eudr/1992/42/contents>

³⁷ His Majesty's Office (HMSO) (2017) The Conservation of Habitats and Species Regulations 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/1012/contents>

³⁸ His Majesty's Office (HMSO) (2019) The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111176573>

- 5.14.2. As described in **Chapter 2: Description of the Site and Surrounding Area**, the Site is located in close proximity to the Dungeness, Rye Bay and Romney Marsh SAC and SPA. As a result, HRA is required to support the Application.
- 5.14.3. While the HRA process is separate to the EIA process, there is considerable overlap between the information required for both assessments. As a result, this EIA Scoping Report acknowledges the potential need for HRA, setting out how it would be integrated into the overall assessment process for the Proposed Development.
- 5.14.4. The Applicant would provide the Competent Authority with information to inform the HRA in the form of a Shadow HRA report. The HRA process requires up to three stages to be worked through, to which each stage is predicated on the stage before. As a result, the process can be halted at a number of points. Insofar as it is appropriate to do so, the technical team would undertake the following as part of the HRA process:
- Screening (Stage 1) – to determine whether the Proposed Development is likely to have a significant effect upon any European designated site, either alone or in combination with other plans or projects.
 - Report to Inform an Appropriate Assessment (Stage 2) – to consider potential adverse effects upon the integrity of the designated sites and to identify necessary mitigation measures required for the Proposed Development.
 - Derogation (Stage 3) – if the Stage 2 report identifies an adverse effect, a derogation assessment would be undertaken, which would set out details including:
 - Consideration of alternative solutions;
 - Consideration of Imperative Reasons of Overriding Public Interest (IROPI)
 - what reasons exist that are sufficient to override the harm to the NSNS; and
 - Identification of compensation measures, which much be delivered to maintain the coherence of the NSNS. Any proposed compensation measures would continue to be discussed with Natural England to determine if the measures proposed achieve this aim.
- 5.14.5. Natural England would be consulted as the statutory nature conservation body throughout the process. Where necessary, information generated for the EIA, including ecological baseline data, air quality modelling, hydrology modelling data and noise baseline assessments, would be used to inform the HRA.
- 5.14.6. The outcome of the Shadow HRA would be reported separately to meet legal requirements but would also be cross-referenced in the ES. This would include information on any mitigation, avoidance measures and any compensation land required.

6. Biodiversity

6.1. Introduction

- 6.1.1. This Chapter of the Scoping Report presents the scope of detailed environmental assessment for Biodiversity for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site and surrounding area. It also sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and then concludes by outlining the method that would be used to undertake the detailed environmental assessment.

6.2. Review of Policy, Legislation, and Relevant Guidance

- 6.2.1. Legislation, planning policy and guidance relating to biodiversity, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- The Environment Act 2021³⁹ - This legislation is part of a post-Brexit legal framework in the UK for environmental protection. The Act makes provisions for targets, plans and policies toward general improvement of the natural environment. Specifically in relation to biodiversity, Part 6 of the Act, introduced a 10% Biodiversity Net Gain (BNG) mandatory requirement for new development falling under the Town and Country Planning Act 1990;
- Conservation of Habitats and Species Regulations 2017 (as amended)⁴⁰ - Also known as the Habitats Directive, this legislation sets out the designation of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) across the UK. These designations give an increased level of legal environmental protection in comparison to domestic protections. Specific species listed under this legislation are also given a higher level of protection. The 2017 regulations were amended in 2019 and became operable from 1st January 2021, which included an amended process for the designation of SACs, and further amendments to ensure operational effectiveness when excluding functions from the European Commission;

39 The Environment Act 2021 (as amended). Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>. Accessed 22/10/2025.

40 Habitats Directive. Available at: <https://www.legislation.gov.uk/ukxi/2017/1012/contents>, accessed 22/10/2025

- Natural Environment and Rural Communities Act 2006 (as amended)⁴¹ - Also referred to as the NERC Act (2006), Section 40 of this legislation sets out the need for public bodies and statutory undertakers to have regard to biodiversity to ensure no net loss of biodiversity going forward. This legislation also establishes Natural England as a non-departmental public body. Section 41 of the Act places a duty on the Secretary of State to maintain species and habitat lists that are of principal importance for the conservation of biodiversity in England;
- Countryside and Rights of Way Act 2000 (as amended)⁴² - This legislation relates to right of access across the UK, giving public access to land which is mapped as “open country” or registered common land. Collectively, these areas are referred to as “open access land” through the CROW Act. The Act sets out the rights permitted on open access land, and subsequently what is not permitted. The Act also clearly sets out the exclusion of access to land which is referred to as ‘excepted land.’;
- Hedgerows Regulations 1997⁴³ - Introduced as part of the Environment Act 1995, specifically relating to arrangements for local authorities in England and Wales to protect hedgerow. These regulations set out protections to control removal of ‘important’ hedgerows via the implementation of a system of notification. This means that local planning authorities must be notified when managers of land (or utility operators) want to remove hedgerow and must provide robust justification. Local authorities can refuse consent for hedgerow removal;
- Protection of Badgers Act 1992 (as amended)⁴⁴ - This Act consolidates previous legislation on the protection of badgers and outlines that it is an offence to take, injure, kill, or ill-treat a badger, interfere with badger setts, sell and come into possession of live badgers, or marking a badger, without obtaining a license from a statutory authority. The Act lists the explicit exceptions to this, as well as the licensing process, enforcement and penalties associated with any offence.; and

41 NERC Act (2006). Available at: <https://www.legislation.gov.uk/ukpga/2006/16/contents>. Accessed 22/10/2025.

42 CROW Act (2000). Available at: <https://www.legislation.gov.uk/ukpga/2000/37/contents>. Accessed 22/10/2025.

43 The Hedgerow Regulations 1997. Available at: <https://www.legislation.gov.uk/uksi/1997/1160/contents>. Accessed 22/10/2025.

44 Protection of Badgers Act 1992. Available at: <https://www.legislation.gov.uk/ukpga/1992/51/contents>. Accessed 22/10/2025.

- Wildlife & Countryside Act 1981 (as amended)⁴⁵ - This Act consolidated previous legislation on the protection and conservation of birds, wild creatures and wild plants, and now provides protection to a range of species of flora and fauna. This Act also details the law relating to Sites of Special Scientific Interest (SSSI). Schedule 9 of the Act lists the flora and fauna for which it is illegal to introduce into the wild or cause the spread of, within the UK.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)⁴⁶ - This provides overarching government policy on energy Nationally Significant Infrastructure Projects (NSIPs), and the way in which any impacts and mitigation measures would be considered. Specific extracts relating to the Proposed Development are as follows:
 - Paragraph 4.6.2 states that “Biodiversity net gain is an essential component of environmental net gain. Projects in England should consider and seek to incorporate improvements in natural capital, ecosystem services and the benefits they deliver when planning how to deliver biodiversity net gain.”
 - Paragraph 4.6.7 states that “In England applicants for onshore elements of any development are encouraged to use the latest version of the biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.”
 - Paragraph 5.4.19 states that “The applicant should show how the project has taken advantage of opportunities to conserve and enhance biodiversity and geological conservation interests.”
 - Paragraph 5.4.21 states that “...the design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains (see Section 4.6 on Environmental and Biodiversity Net Gain). The scope of potential gains would be dependent on the type, scale, and location of each project.”
 - Paragraph 5.4.36 states that “Applicants should produce and implement a Biodiversity Management Strategy as part of their development proposals. This could include provision for biodiversity awareness training to employees and contractors so as to avoid unnecessary adverse impacts on biodiversity during the construction and operation stages.”
- Paragraph 5.4.53 states that “The Secretary of State should not grant development consent for any development that would result in the loss or

⁴⁵The Wildlife and Countryside Act 1981 (as amended). Available at: <https://www.legislation.gov.uk/ukpga/1981/69>. Accessed 22/10/2025.

⁴⁶ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons, and a suitable compensation strategy exists.”

- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)⁴⁷ - This provides overarching government policy on energy NSIPs, and the way in which any impacts and mitigation measures would be considered. Specific extracts relating to the Proposed Development are as follows:
 - Paragraphs 2.10.75 to 2.10.83 state that “Generic environmental, biodiversity, ecology, geological and water management impacts are covered in section 4.3 (Environmental Principles), section 4.6 (Environmental and Biodiversity Net Gain), section 5.4 (Biodiversity and Geological Conservation) and section 5.8 (Flood Risk) of EN-1.

The applicant’s ecological assessments should identify any ecological risk from developing on the proposed site.

Issues that need assessment may include habitats, ground nesting birds, wintering and migratory birds, bats, dormice, reptiles, great crested newts, water voles and badgers.

The applicant should use an advising ecologist during the design process to ensure that adverse impacts are avoided, minimised or mitigated in line with the mitigation hierarchy, and biodiversity enhancements are maximised.

The assessment may be informed by a ‘desk study’ of existing ecological records, an evaluation of the likely impacts of the solar farm upon ecological features, and should specify mitigation to avoid or minimise these impacts, and any further surveys required.

Applicants should consider earthworks associated with construction compounds, access roads and cable trenching.

Where soil stripping occurs, topsoil and subsoil should be stripped, stored, and replaced separately to minimise soil damage and to provide optimal conditions for site restoration. Further details on minimising impacts on soil and soil handling are above at paragraphs 2.10.33 and 2.10.34.

Applicants should consider how security and lighting installations may impact on the local ecology. Where pole mounted CCTV facilities are proposed the location of these facilities should be carefully considered to minimise impact. If lighting is necessary, it should be minimised and directed away from areas of likely habitat.

Applicants should consider how site boundaries are managed. If any hedges/scrub are to be removed, further surveys may be necessary to account for impacts. Buffer strips between perimeter fencing and hedges may be proposed, and the construction

⁴⁷ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

and design of any fencing should account for enabling mammal, reptile and other fauna access into the site if required to do so in the ecological report.”

- National Planning Policy Framework (NPPF) (updated February 2025)⁴⁸ - The National Planning Policy Framework (NPPF) is an overarching document which sets out government planning policy for development outside of the NSIP regime in England, and how this is expected to be applied by local authorities and developers. The NPPF can be an important and relevant consideration for NSIPs as well, but in the event of any conflict, the NPS policy prevails. The NPPF provides a framework for local sustainable development via local plans. Specific extracts relating to this Proposed Development are as follows:

Paragraph 187 states that *“Planning policies and decisions should contribute to and enhance the natural and local environment by:*

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)⁴⁹, specifically Policy CC6 ‘Solar Farms’;

⁴⁸ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> -

⁴⁹ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)⁵⁰;
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)⁵¹; and
- Rother Local Plan Core Strategy (Adopted 29th September 2014)⁵².

National Guidance

- Planning Practice Guidance – Biodiversity Net Gain⁵³
- Chartered Institute for Ecology and Environmental Management (CIEEM) (2018, updated 2022) Guidelines for Ecological Impact Assessment in the UK and Ireland, CIEEM version 1.2, Winchester⁵⁴.

Local Guidance

- Kent Nature Partnership Biodiversity Strategy 2020 to 2045 (2020)⁵⁵
- Draft Kent and Medway Local Nature Recovery Strategy (2025)⁵⁶
- East Sussex and Brighton & Hove Local Nature Recovery Strategy (Habitat Measures) V6.3 (Draft)⁵⁷
- Sussex Biodiversity Partnership – Biodiversity Opportunity Areas⁵⁸

6.2.2. Further information on legislation and planning policy in relation to the Proposed Development is available within **Chapter 4: Planning Policy Context**.

⁵⁰Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

⁵¹ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

⁵² Rother Local Plan - <https://rdcpublic.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

⁵³ Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities – Planning Practice Guidance – Biodiversity Net Gain. Available at: <https://www.gov.uk/guidance/biodiversity-net-gain>

⁵⁴ [Guidelines for Ecological Impact Assessment \(EcIA\) | CIEEM](https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/) <https://cieem.net/resource/guidelines-for-ecological-impact-assessment-ecia/>

⁵⁵ Kent Nature Partnership Biodiversity Strategy 2020 to 2045. Available at: <https://kentnature.org.uk/wp-content/uploads/2022/01/Kent-Biodiversity-Strategy-2020.pdf>

⁵⁶ Draft Kent and Medway Local Nature Recovery Strategy. Available at <https://letstalk.kent.gov.uk/nature-recovery>

⁵⁷ East Sussex and Brighton & Hove Local Nature Recovery Strategy (Habitat Measures) V6.3 (Draft). Available at: https://www.sussexnaturerecovery.org.uk/media/2025/07/Sussex%20LNRS%20Measures_v7%20EAST%20SUSSEX.pdf

⁵⁸ https://sussexlnp.org.uk/wp-content/themes/twentytwentyone-child/BOAdocuments/Romney_Marsh_Area.pdf

6.3. Existing Baseline Conditions

- 6.3.1. This section of the Scoping Chapter for Biodiversity sets out the known baseline conditions at this (scoping) stage of the project. It is noted that further surveys and assessment are proposed to inform the detailed technical assessment for the Environmental Statement (see details and scope of the further baseline data below).

Approach to the Collection of Baseline Data for Scoping

- 6.3.2. Baseline data collection for the Proposed Development began in 2023, with wintering bird surveys beginning in November ahead of a desk study and wider field survey programme. The desk study was undertaken to gather existing information on statutory and non-statutory sites (known as Local Wildlife Sites (LWS) in Sussex and Kent) designated for nature conservation reasons, Habitats and Species of Principal Importance (SPI), and legally protected, controlled or otherwise notable species within the Site boundary or in the area over which effects on ecological features of development could be realised (referred to as the Zone of Influence or ZOI). Information was gathered from a number of sources including publicly available data and detailed information purchased from local ecological record centres. Table 6.1 describes the ecological features for which data was collected, the relevant ZOI for each ecological feature and the sources of the information.

Table 6.1 Ecological features, Zol and information sources

Ecological feature	Zol (KM)	Data sources
Internationally designated sites ⁵⁹	10	Multi Agency Government Information for the Countryside (MAGIC) website ⁶⁰
Special Areas of Conservation (SAC) for which bats are the primary reason for designation	30	JNCC ⁶¹
Nationally designated sites ⁶²	5 (or relevant Sites of Scientific Interest (SSSI) Impact Risk Zones (IRZ) where relevant	MAGIC
Local Nature Reserves (LNR)	2	MAGIC
Local Wildlife Sites (LWS)	2	Sussex Biological Record Centre (SXBRC) and Kent and Medway Biological Record Centre (KMBRC)
Habitats of Principal Importance (HPI) / Ancient Woodland	1	Priority Habitat Inventory and Ancient Woodland Inventory – provided on MAGIC and forestry commission map browser ⁶³

⁵⁹ Special Protection Areas (SPA), Special Areas of Conservation (SAC), proposed SAC, potential SPA, Ramsar sites and proposed Ramsar sites. SAC and SPA are protected via legislation, whilst the other sites are treated comparatively through policy. See - [Habitats regulations assessments: protecting a European site - GOV.UK](#)

⁶⁰ [MAGIC](https://magic.defra.gov.uk/) <https://magic.defra.gov.uk/>

⁶¹ [UK Protected Area Datasets for Download | JNCC - Adviser to Government on Nature Conservation](#)

⁶² Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR)

⁶³ <https://www.forestergis.com/Apps/MapBrowser/>

Ecological feature	ZoI (KM)	Data sources
Legally protected and notable species – bats and birds.	5	SXBRC and KMBRC – European Protected Species (EPS) licencing returns provided on MAGIC
Legally protected and notable species – invertebrates, badgers, water vole, otter and all other species.	2	SXBRC and KMBRC
Legally controlled invasive non-native species, listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).	2	SXBRC and KMBRC
Waterbodies (ponds, wet ditches, lakes) inside or within 500m of the Site boundary.	0.5	Satellite imagery and Ordnance Survey Mapping
Veteran trees.	0.5	Ancient tree inventory ⁶⁴

6.3.3. A range of ecology surveys have been completed, are ongoing or are planned for the Site boundary. Specific survey areas for these surveys are the Site boundary unless otherwise specified. Survey areas may be larger than the Site boundary, to account for potential buffer zones and / or overlapping habitats but are not reduced within the Site boundary. Surveys are:

- Extended UK Habitat Classification Survey (began 2024, ongoing);
- Habitat condition assessment (began 2024, ongoing);
- River condition assessment (planned);
- Breeding bird survey (completed);
- Non-breeding bird survey (began 2023, ongoing);
- Passage bird survey (began 2025, ongoing);
- Bat survey (completed);
- Invertebrate scoping survey (completed);

⁶⁴ [Tree Search - Ancient Tree Inventory https://ati.woodlandtrust.org.uk/tree-search/?v=2843329&ml=map&z=11.130118099867051&nwLat=51.018182165761885&nwLng=0.6391090972202846&seLat=50.87349766047373&seLng=1.2389292103308662](https://ati.woodlandtrust.org.uk/tree-search/?v=2843329&ml=map&z=11.130118099867051&nwLat=51.018182165761885&nwLng=0.6391090972202846&seLat=50.87349766047373&seLng=1.2389292103308662)

- Badger survey (began 2024, ongoing);
- Riparian mammal survey (otter and water vole) (began 2024, ongoing);
- Great crested newt survey (planned); and
- Macrophyte survey (planned).

Extended UK Habitat Classification Survey

- 6.3.4. A UK Habitat (UKHab) Classification Survey was undertaken at the Site between July 2024 and August 2025. This survey followed the standard methodology for mapping habitats in-line with UKHab Classification Version 2.0⁶⁵, allowing habitat information gathered in the field to be input to the Statutory Biodiversity Metric⁶⁶, which would underpin the biodiversity net gain (BNG) assessment. This method was extended to include identifying and mapping any legally controlled species, or potential the Proposed Development has for protected or otherwise notable (in a legal and planning context) species, based on habitats found and the regional context (Extended habitat survey). This information was used as a basis for determining the need for further species-specific elements of the field survey programme.

Habitat condition assessment

- 6.3.5. Habitat condition assessments were undertaken across the whole Site boundary concurrently with the UKHab survey to assign habitat parcels a condition assessment in-line with the latest published guidance⁶⁶. This information would be used to underpin the BNG assessment for the Proposed Development.

River Condition Assessment

- 6.3.6. A river condition assessment (RCA) would be undertaken by a certified surveyor covering all watercourses within the Site boundary. The RCA would include a Modular River Survey (MoRPh survey) categorising and assessing the condition of watercourses appropriately. The results of the RCA would be included within the BNG assessment for the Proposed Development.

Breeding bird surveys

- 6.3.7. A breeding bird survey and territory mapping exercise following an amended version of the British Trust for Ornithology's (BTO) common bird census (CBC) methodology (Gilbert et al., 1998⁶⁷) was undertaken across the Site boundary,

⁶⁵ UKHab V2.0 <https://www.ukhab.org/>

⁶⁶ [Statutory biodiversity metric tools and guides - GOV.UK](https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides)

<https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

⁶⁷ Gilbert, G., Gibbons, D.W. & Evans, J. (1998) Bird Monitoring Methods: A Manual of Techniques for Key UK Species. RSPB, Sandy, Bedfordshire.

with six visits and the usual ten visits for the CBC⁶⁸⁶⁹. The location of each bird detected (visually and / or aurally) was mapped using the standard two-letter BTO codes, and bird activity was recorded using standard behaviour codes (Marchant, 1983⁶⁹). Where surveys have identified potential important receptors such as Schedule 1 listed breeding birds, further consideration would be given to additional impacted species.

Non-breeding bird survey

- 6.3.8. Non-breeding bird surveys began in November 2023 and would continue through to March 2027. Surveys covered the Site boundary plus a 500m buffer. These surveys are primarily focused on recording any species associated with the nearby Special Protection Area (SPA) and Ramsar designations (See **Chapter 2: Description of the Site and Surrounding Area**, Table 2.1 - Statutory Ecological Designations), including notified features, and waders and wildfowl considered as part of the overall non-breeding assemblage that may utilise the Site boundary (mainly arable fields) for foraging, loafing or roosting. These surveys aim to identify if there is any land within the Site boundary that is frequently utilised by notified features and if it therefore constitutes Functionally Linked Land (FLL). In addition, other target species of interest such as flocks of wintering thrushes or aggregations of gulls are also being recorded. The method follows the non-breeding walkover survey method as described by the Bird Survey & Assessment Steering Group. It uses transects and the scanning of habitats to record the type, number and behaviour of birds seen using the survey area.

Bat activity survey

- 6.3.9. Bat surveys were devised generally following the Bat Conservation Trust's '*Bat Surveys for Professional Ecologists Good Practice Guidelines*' fourth edition (Collins (ed.), 2023). Prior to surveys beginning, a licensed bat surveyor determined that the Site boundary comprised habitats that were generally of low suitability for bats, based on habitats present – though it is noted that due to the location of the Site boundary, there is potential for the migratory species *Nathusius' pipistrelle* to be present when leaving or arriving in the UK. Following the assessment of potential, four transects were devised to sample bat activity across the area to provide an understanding of the bats present and general levels of activity. A full survey of every field across the Site boundary was not considered necessary, especially considering the development of early design principles that seek to retain, enhance and create habitats that are used most frequently by bats (e.g. linear features). The transects were subject to bat activity surveys in spring, summer and autumn; with the autumn survey timed to coincide with *Nathusius' pipistrelle* migration. On each transect, two static bat

⁶⁸ Bird Survey & Assessment Steering Group (2023) Bird Survey Guidelines for assessing ecological impacts, v1.1.0. <https://birdsurveyguidelines.org> [accessed March 2023]

⁶⁹ Marchant, J.H. (1983) BTO Common Bird Census Instructions. BTO, Tring.

detectors were also installed and left to record for a period of five nights per season. In addition, a preliminary ground level roost assessment of trees and buildings within and close to the Site boundary was undertaken.

Invertebrate scoping survey

- 6.3.10. A terrestrial invertebrate scoping survey was conducted in July 2025 to assess the potential of the Site boundary to support potentially important populations or species of terrestrial invertebrates. Further surveys would be conducted in summer 2026 if areas of potential importance to invertebrates have the potential to be impacted by the Proposed Development. Aquatic invertebrate surveys would be scoped proportionately in relation to ditch crossings, with samples to be taken at all potential watercourse crossings. Where works within the riparian zone have the potential to impact aquatic invertebrates, surveys would be undertaken to assess potential.

Badger survey

- 6.3.11. A Badger survey was undertaken concurrently with the extended habitat survey. Surveyors, independently of habitat recording tasks, searched for signs of badger activity including setts, feeding signs, latrines and footprints in line with Scottish Badgers (2018) “*Surveying for Badgers – Good Practice Guidelines, version 1*”. The exception to this was that the badger survey was undertaken across spring and summer due to the large scale of the Site boundary. However, this is considered acceptable due to the open nature of the landscape not obscuring potential sett locations or signs located within dense areas of vegetation even during the summer months.

Riparian mammals

- 6.3.12. Riparian mammals were surveyed along the watercourses within the Site boundary and around the waterbodies present. The surveys were undertaken concurrently with the extended habitat survey and searched for the signs of activity that are described for water vole in the “*Water Vole Mitigation Handbook*”⁷⁰ and for otter in “*Monitoring the Otter*” (Chanin, 2003⁷¹). Areas up to 250m away from water, where suitable habitat exists, were also investigated for potential to support otter natal holts. Mink traps were observed within some of the surveyed area.

Great crested newts

⁷⁰ Dean, M., Strachan, R., Gow, D. & Andrews, R. (2016). The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series). Eds Fiona Matthews and Paul Chanin. The Mammal Society, London.

⁷¹ Chanin, P. (2003). Monitoring the Otter. *Lutra lutra*. Conserving Natura 2000 Rivers Monitoring Series No 10. Peterborough, English Nature.

- 6.3.13. Great crested newt (GCN) surveys would be scoped following further design evolution to ensure any waterbodies within 500m of potentially impacted areas are suitably assessed. Slow-flowing watercourses with the potential to support GCN would also be subject to survey. Surveys would include a Habitat Suitability Index (HSI) (Oldham et al. 2000⁷²) and sampling for environmental DNA (eDNA). The eDNA samples would be collected using testing kits that would be provided and screened by SureScreen, a Natural England approved supplier following the method developed by Biggs et al. (2014)⁷³ and additional instructions provided with the sampling kits.

Macrophyte survey

- 6.3.14. A macrophyte survey would be conducted in 2026 if watercourses or ditch-systems with the potential to support notified features listed on the nearby SSSI designations are to be impacted by the Proposed Development.

Reptiles

- 6.3.15. It is noted that common reptiles may be present within some small portions of the Site boundary, within arable verges and grassland areas, with observations and target notes provided for common lizard and slow worm. However, due to the baseline habitats, no survey for this group has been specified as solar development can be undertaken sympathetically to reptiles to ensure legislative compliance and provide long term benefits in terms of better habitat quality given the current arable condition of the Site boundary. Any development / construction activities within habitats that have potentially suitable reptile habitat would be in-line with best practice to avoid potential impacts.

Relevant Baseline Conditions for Scoping

Designated sites

- 6.3.16. There are three internationally designated sites within 10km of the Site boundary: Dungeness, Romney Marsh and Rye Bay SPA and Ramsar, and Dungeness SAC. These designated sites, varying in extent, show considerable geographic overlap within the zone of influence (See **Figures 2.3-2.7 within Appendix E**).

⁷² Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M., (2000). Evaluating the suitability of habitat for the great crested newt (*Triturus cristatus*). *Herpetological Journal*, 10(4), p.143-155

⁷³ Biggs J, Ewald N, Valentini A, Gaboriaud C, Griffiths RA, Foster J, Wilkinson J, Arnett A, Williams P and Dunn F, (2014). Analytical and methodological development for improved surveillance of the Great Crested Newt. Appendix 5. Technical advice notes for field and laboratory sampling of great crested newt (*Triturus cristatus*) environmental DNA. Freshwater Habitats Trust, Oxford.

6.3.17. Dungeness, Romney Marsh and Rye Bay SPA covers an area of 4010.29 ha with qualifying features under article 4.1 of the Wild Birds Directive⁷⁴⁷⁵:

- Bewick's swan *Cygnus columbianus bewickii*, 155 individuals (wintering) based on five-year peak mean 2002/3 - 2006/07. Representing 1.9% of the GB population;
- Bittern *Botaurus stellaris*, 5 individuals (wintering) based on five-year peak mean 2002/3 - 2006/07. Representing 5.0% of the GB population;
- Hen harrier *Circus cyaneus*, 11 individuals (wintering) based on five-year peak mean 2002/3 - 2006/07. Representing 1.5% of the GB population;
- Golden plover *Pluvialis apricaria*, 4050 individuals (wintering) based on five-year peak mean 2002/3 - 2006/07. Representing 1.6% of the GB population;
- Ruff *Philomachus pugnax*, 51 individuals (wintering) based on five-year peak mean 2000/01 - 2004/05. Representing 7.3% of the GB population;
- Aquatic warbler *Acrocephalus paludicola*, 2 individuals (passage) based on five-year mean 2004 - 2008. Representing 6.1% of the GB population;
- Marsh harrier *Circus aeruginosus*, 4 females (breeding) based on five-year mean 2004 - 2008. Representing 2.0% of the GB population;
- Avocet *Recurvirostra avosetta*, 31 pairs (breeding) based on five-year mean 2004 - 2008. Representing 3.5% of the GB population;
- Mediterranean gull *Larus melanocephalus*, 56 pairs (breeding) based on five-year mean 2004 - 2008. Representing 52.2% of the GB population;
- Sandwich tern *Sterna sandvicensis*, 350 pairs (breeding) based on five-year mean 2004 - 2008. Representing 3.3% of the GB population;
- Common tern *Sterna hirundo*, 273 pairs (breeding) based on five-year mean 2004 - 2008. Representing 2.7% of the GB population; and
- Little tern *Sterna albifrons*, 35 pairs (breeding) based on five-year mean 1992 - 1996. Representing 1.5% of the GB population.

6.3.18. The site also qualifies under article 4.2 of the Directive as it is used regularly by 1% or more of the biogeographical populations of the following regularly occurring migratory species (other than those listed in Annex I) in any season:

- Shoveler *Anas clypeata*, 485 individuals (wintering) based on five-year peak mean 2002/3 - 2006/7. Representing 1.2% Northwest & Central Europe (non-breeding) population.

⁷⁵ The Birds Directive, European Commission. Available at: https://environment.ec.europa.eu/topics/nature-and-biodiversity/birds-directive_en

- 6.3.19. The site also qualifies separately under article 4.2 as it is used regularly by over 20,000 waterbirds (waterbirds as defined by the Ramsar convention) in any season:
- In the non-breeding season, the area is regularly used by 34,625 individual waterbirds (five-year peak mean 2002/3 - 2006/7), including (but not limited to) Bewick's swan *Cygnus columbianus bewickii*, European white-fronted goose *Anser albifrons albifrons*, wigeon *Anas penelope*, gadwall *A. strepera*, shoveler *A. clypeata*, pochard *Aythya ferina*, little grebe *Tachybaptus ruficollis*, great crested grebe *Podiceps cristatus*, cormorant *Phalacrocorax carbo*, bittern *Botaurus stellaris*, coot *Fulica atra*, golden plover *Pluvialis apricaria*, lapwing *Vanellus vanellus*, sanderling *Calidris alba*, ruff *Philomachus pugnax*, whimbrel *Numenius phaeopus* and common sandpiper *Actitis hypoleucos*.
- 6.3.20. Dungeness, Romney Marsh and Rye Bay Ramsar site covers an area of 6377.63 ha qualifying under Criterion 1, 2, 5 and 6 of the Ramsar Convention (RAMSAR)⁷⁶.
- 6.3.21. The site qualifies under Criterion 1 because it contains representative, rare, or unique examples of natural or near-natural wetland types including:
- Annual vegetation of drift lines and the coastal fringes of perennial vegetation on stony banks (Ramsar wetland type E – sand, shingle or pebble shores); and
 - Natural shingle wetlands: saline lagoons (Ramsar wetland type J – coastal brackish/saline lagoons), freshwater pits (Ramsar wetland type K – coastal freshwater lagoons) and basin fens (Ramsar wetland type U – non-forested peatlands).
- 6.3.22. The site qualifies under Criterion 2 because it supports threatened ecological communities including Bryophytes, vascular plants and invertebrates, with further recognition under Criterion 2 because it supports vulnerable, endangered or critically endangered species including:
- Greater water-parsnip *Sium latifolium*
 - Warne's thread-moss *Bryum warneum*
 - Water vole *Arvicola amphibius*
 - Aquatic warbler *Acrocephalus paludicola*
 - Great crested newt *Triturus cristatus*

76 Ramsar site criteria. Available at:

https://www.ramsar.org/sites/default/files/documents/library/ramsarsites_criteria_eng.pdf.

Accessed 22/10/2025.

- Medicinal leech *Hirudo medicinalis*
- A ground beetle *Omophron limbatum*
- Marsh mallow moth *Hydraecia osseola hucherardi*; and
- De Folin's lagoon snail *Caecum amoricum*.

6.3.23. The site qualifies under Criterion 5 as it regularly supports 20,000 or more waterbirds: in the non-breeding season the site regularly supports 34,957 individual waterbirds (five-year peak mean 2002/3 - 2006/7).

6.3.24. The site qualifies under Criterion 6 as it regularly supports 1% of the individuals in the populations of the following species or subspecies of waterbird in any season:

- Mute swan *Cygnus olor*, 348 individuals (wintering), based on five-year peak mean 2002/3 - 2006/7. Representing 1.1% of the British population; and
- Shoveler *Anas clypeata*, 485 individuals (wintering), based on five-year peak mean 2002/3 - 2006/7. Representing 1.2% of the northwest & central Europe non-breeding population.

6.3.25. Dungeness SAC covers an area of 3241.43 ha and is designated for the presence and extent of habitats listed on Annex I, and importance for species listed on Annex II of the Habitats Directive⁷⁷.

6.3.26. Annex I habitats that are a primary reason for selection of this site include:

- Annual vegetation of drift lines, of which 9.72ha is recognised; and
- Perennial vegetation of stony banks, of which 2269ha is recognised.

6.3.27. An Annex II species that is a primary reason for selection of this site is the great crested newt.

6.3.28. There are no other Annex I habitats, or Annex II species present as qualifying features of the SAC.

6.3.29. The cable route for the Proposed Development, which at this stage retains optionality, overlaps these designations to varying extents dependent upon the chosen route to the point of connection.

6.3.30. There are no SACs for which bats are the primary reason for designation within 30km of the Site boundary.

⁷⁷ The Habitats Directive (Council Directive 92/43/EEC). Available at:
https://environment.ec.europa.eu/topics/nature-and-biodiversity/habitats-directive_en

- 6.3.31. There are three nationally designated sites of importance to biodiversity within 5km of the Site boundary including two SSSIs and one National Nature Reserve (NNR) (See **Figures 2.6 to 2.7 within Appendix E**): Rye Harbour SSSI; Dungeness, Romney Marsh and Rye Bay SSSI; and Dungeness NNR.
- 6.3.32. Rye Harbour SSSI covers an area of 761.1ha and is notified as a large and ecologically complex site of considerable biological and geological importance. It has the only extensive tract of shingle in East Sussex; only Dungeness in Kent (a site of international importance [Dungeness SAC]) has a larger area of this habitat in Southern Britain. The site also contains areas of alluvial grazing marsh, saltmarsh, and intertidal sands and muds. The diversity and rarity of habitats present at Rye Harbour account for the extremely rich flora and fauna, the site supports nationally important communities of plants, birds and invertebrates. It is the locality of the endangered least lettuce *Lactuca saligna*, a species listed on Schedule 8 of the Wildlife and Countryside Act 1981 as requiring special protection.
- 6.3.33. Dungeness, Romney Marsh and Rye Bay SSSI covers an area of 9090ha and is notified as a nationally important site by reason of a diverse range of biological and geological features, specifically the coastal geomorphology of Dungeness and Rye Harbour and the following nationally important habitats: saltmarsh, sand dunes, vegetated shingle, saline lagoons, standing waters, lowland ditch systems, and basin fens. These habitats and others within the SSSI support the following nationally important species interests: populations of four vascular plant species listed in Schedule 8 of the Wildlife and Countryside Act 1981 (as amended); an assemblage of Schedule 8, nationally rare and nationally scarce vascular plants; populations of the vulnerable Warne's thread-moss; populations of water voles; an assemblage of breeding birds associated with shingle beaches and saltmarsh, lowland damp grasslands, lowland open waters and their margins, and scrub; breeding numbers of 16 species of bird; assemblage of over 20,000 waterfowl in the non-breeding season; wintering numbers of 17 species of bird and three species during passage periods; metapopulations of great crested newts; endemic species and subspecies of invertebrates; populations of two invertebrate species listed in Schedule 5 of the Wildlife and Countryside Act 1981 (as amended); populations of ten endangered, vulnerable and rare invertebrate species; assemblages of invertebrates occurring on 'dry' coastal habitats; and assemblages of wetland invertebrates.
- 6.3.34. Dungeness NNR covers an area of 1030ha and is designated as one of the largest shingle landscapes in the world. With main habitats noted as coastal, lowland grassland and maritime. It is noted to have over 600 species of plants recorded.
- 6.3.35. The Site currently overlaps with ~51ha of Dungeness, Romney Marsh and Rye Bay SSSI. There is a commitment for no solar or BESS infrastructure within this area, which is retained within the Site boundary, as it is currently located as

potential for underground cabling or access requirements, or potential enhancement land.

6.3.36. There is potential for further overlap with the Dungeness, Romney Marsh and Rye Bay SSSI and overlap with Dungeness NNR for the cable corridor search area, though in the areas potentially impacted, these designations are geographically overlapping with the international designations for Dungeness, Romney Marsh and Rye Bay SPA and Ramsar, and Dungeness SAC. Each designation would be considered appropriately in-line with best practice guidelines.

6.3.37. There are no LNRs within 2km of the Site.

Non-statutory designated sites

6.3.38. There are three LWSs within 2km of the Site, all of these LWSs are outside of the Site boundary. These LWSs and their reasons for designation are briefly outlined below:

- *Camber Sands: Camber Sands is one of only a few locations in the county to contain coastal sand dunes. The coastal sand dune habitat at CR33, comprises yellow open dune, fixed dune grassland and dune scrub, and is a nationally and locally important habitat. This habitat also contains a number of nationally and locally notable plant species including hound's-tongue Cynoglossum officinale, sand sedge Carex arenaria and lyme-grass Leymus arenarius. The site is adjacent to the Dungeness, Romney Marsh and Rye Bay SSSI and provides an important function of buffering the habitats within the SSSI. It also includes some of the later successional habitats not found within the SSSI at this location.*
- *Midley Chapel Pasture, Hawthorn corner LWS: This site comprises neutral grassland surrounded by dykes and hedgerows. Two fields are semi-improved and two others have recently been improved. These grazing meadows form an isolated community of fields valuable for wildlife in an otherwise arable area. The fields hold a diverse flora, which is particularly rich in the wetter area beside the road. The damper grassland supports a range of sedges, including divided sedge Carex divisa, spiked sedge C. spicata, oval sedge C. ovalis and hairy sedge C. hirta. Green winged orchid Orchis morio has been found recently in this area. Other species present include bird's-foot-trefoil Lotus corniculatus, greater bird's-foot-trefoil L. pedunculatus, common fleabane Pulicaria dysenterica, gypsywort Lycopodium europaea and common restharrow Ononis repens. Yellow rattle Rhinanthus minor, adder's-tongue Ophioglossum vulgatum, spring sedge Carex caryophyllaea and carnation sedge C. panicea have been recorded from the fields in the past. The surrounding dykes contain common reed Phragmites australis, reed canary-grass Phalaris arundinacea, fine-leaved water-dropwort Oenanthe aquatica, yellow iris Iris pseudacorus, reed sweetgrass Glyceria maxima and rush species, including jointed rush Juncus articulatus. These dykes and the surrounding hedgerows add to the wildlife interest of the site. Two ponds*

are present, one of which supported great crested newt in a recent amphibian survey. Grass snake and marsh frog also occur; and

- **Lydd common and pastures LWS:** *Much of this site comprises very thin, acid, sandy-soiled grassland which has developed on blown sand over old shingle ridges. There are also areas of lichen and mossy heath over shingle, and small areas of bare shingle along the edges of old tracks across the common. Where the soils are deeper in the hollows, or where there has been some enrichment, coarser grassland is present. Occasionally, areas of scrub with gorse, broom, hawthorn and elder occur. The area is tightly rabbit-grazed in some parts, with large rabbit warrens present, and some of the ridges are honeycombed with holes. This type of habitat is very rare in Kent and is restricted to the Dungeness-Lydd area. Grass species include annuals such as early hair-grass *Aira praecox* and squirreltail fescue *Vulpia bromoides*. Sheep's fescue *Festuca ovina*, red fescue *F. rubra*, sweet vernal-grass *Anthoxanthum odoratum* and common bent *Agrostis capillaris* are the main species to be found in the less open turf. Of particular interest is the one sand-covered ridge colonised by marram grass *Ammophila arenaria* and sand sedge *Carex arenaria*. This is slightly more inland than usual for marram grass, which is more often found on open dunes at the sea. Other species present include harebell *Campanula rotundifolia*, heath bedstraw *Galium saxatile*, lady's bedstraw *G. verum*, common storks-bill *Erodium cicutarium*, sand spurrey *Spergularia rubra* and common cat's-ear *Hypochoeris radicata*. There is much sheep's-bit *Jasione montana* in the acid turf, together with sand sedge and sheep's sorrel *Rumex acetosella*. The thin vegetation along the sides of the shingle tracks is particularly interesting, containing several small legumes in addition to common whitlowgrass *Erophila verna* and wall speedwell *Veronica arvensis*. The legumes include suffocated clover *Trifolium suffocatum*, fenugreek *T. ornithopodioides*, knotted clover *T. striatum*, subterranean clover *T. subterraneum* and bird's-foot *Ornithopus perpusillus*. Where the shingle ridges are bare of sand, a rich lichen heath has developed, with species including *Cladonia foliacea*, *C. portentosa* and *C. furcata*, *Hypogymnia physodes* and *Cornicularia aculeata*. Bryophytes include *Dicranum scoparium* and *Polytrichum juniperinum*, *Campylopus introflexus* and *Hypnum jutlandicum*. Three small, sheep-grazed pastures adjoin the common. These are slightly less rich, but still contain good amounts of sheep's-bit and sand sedge, and both heath bedstraw and lady's bedstraw. There is a small scrubby area at the northern end of the site, which has gorse, broom and a little blackthorn. There is a small area of generally unmanaged, rather rank acid grassland at TR 047216 with a ditch along its north-western edge and some scattered scrub. A variety of grass species found here includes common bent, sweet vernal-grass, meadow barley *Hordeum secalinum* and early hair[1]grass, in addition to false oat-grass *Arrhenatherum elatius*, Yorkshire fog *Holcus lanatus* and cock's foot *Dactylis glomerata* in the ranker areas. Oval sedge *Carex ovalis*, field wood-rush *Luzula campestris* and sand sedge are also present, particularly where the grassland is rabbit-grazed. Other species include bird's foot-trefoil *Lotus corniculatus*, lesser stitchwort *Stellaria graminea*, common sorrel *Rumex acetosa*, sheep's sorrel,*

lesser hawkbit Leontodon saxatilis, heath bedstraw and heath groundsel Senecio sylvaticus. The ditch supports a variety of common marginal and emergent plant species, including common reed Phragmites australis, waterplantain Alisma plantago-aquatica, tufted forget-me-not Myosotis laxa, false fox-sedge Carex otrubae and tubular water-dropwort Oenanthe fistulosa

- 6.3.39. There is one Roadside Nature Reserve (RNR) - FH07 Tournay Road. This RNR has been designated because it has a mosaic of uncommon shingle plants and others typical of sandy soils.

Habitats

- 6.3.40. There are no ancient woodlands or veteran trees within the ZOI as defined in Table 6.1 above.
- 6.3.41. Within the Site there is a single parcel of Coastal and Floodplain Grazing Marsh (CFPGM) identified on the Priority Habitat Inventory⁷⁸ and does not match the UK Biodiversity Action Plan (UK BAP) Priority Habitat Description for Coastal Floodplain Grazing Marsh as a review of time-lapse aerial imagery suggests the area has been used for crop production for more than 20 years.
- 6.3.42. The cable route options for the Proposed Development potentially crosses areas of coastal vegetated shingle, amongst other habitats, within the designated areas, though working methods are not yet finalised with potential for either overhead lines or undergrounding of cables.
- 6.3.43. The Site supports a range of habitats, although it is dominated by arable fields, with a mix of cereal crops and grass cultivars that make up most of the area. Field margins, though distinct, vary throughout the Site boundary with wide margins in the South Brooks A area, and narrower margins elsewhere. Margins are dominated by modified grassland with a proportion made up of other neutral grassland.
- 6.3.44. There are few hedgerows within the Site boundary, with the majority being defunct examples of species poor hedgerows, in poor condition. The dominant species within the hedgerows is hawthorn.
- 6.3.45. A network of watercourses' cross the Site boundary including ditches, drains and large lotic sewers, which are shown on the Statutory Main River Map⁷⁹. Many of these watercourses are noted for their aquatic vegetation (macrophyte assemblages) and provide suitable habitat for water vole, with confirmed presence within the Site boundary. The watercourse network is widely connected throughout the Site including to designated areas nearby.

⁷⁸ [Coastal and floodplain grazing marsh \(UK BAP Priority Habitat description\)](#)

⁷⁹ [Statutory Main River Map](#)

- 6.3.46. There is a small, isolated woodland copse within the Site boundary that abuts the farmstead at Scotney Court Farm. The woodland's origin appears to be as planted treelines along a watercourse which have grown out and produced additional self-set standards. The woodland comprises a mix of broadleaved species and is considered of limited importance to conservation.
- 6.3.47. Small, scattered parcels of scrub are located within field margins or as bankside vegetation adjacent to ditch networks, with mixed scrub, bramble scrub, willow scrub and hawthorn scrub present.
- 6.3.48. Several ponds, both temporary and permanent, have been identified within and adjacent to the Site boundary. Should potential impacts on these waterbodies (or species potentially within them) be present due to the Proposed Development, further assessment may be required – the scope of which is discussed separately in the species section.

Species

- 6.3.49. Water vole have been recorded in several ditches within and adjacent to the Site, with signs suggestive of residency. There have been no records of otter during the survey work to date.
- 6.3.50. Badger have been recorded regularly within and adjacent to the Site boundary, with foraging signs and latrines located frequently, and setts identified. Setts were typically dug into flat and open ground around the edges of fields when there were no banks to burrow into. It is likely that due to the scale of the Site boundary there are several clans present.
- 6.3.51. Breeding bird surveys identified a range of common and widespread farmland species using the Site boundary. However, there were also records of notable species including breeding tree sparrow, Cetti's warbler, yellow wagtails and yellowhammer. Hobby and marsh harrier potentially bred within or adjacent to the Site boundary, with foraging barn owl and peregrine also recorded (both observed mainly off Site). Anecdotal records suggest barn owl breed within the Site boundary at one location. Skylark were also present breeding within arable fields. As a result of the nature of the habitats, the density and variation of breeding birds is generally considered to be low.
- 6.3.52. The non-breeding bird surveys are ongoing. Preliminary results suggest that species (and features) notified on the nearby SPA and Ramsar designations are utilising the Site boundary in relatively low numbers, with golden plover, lapwing, mute swan, wigeon and waterbirds considered as part of the overall non-breeding assemblage recorded to date. Larger assemblages of waterbirds, including notified features, have been observed outside of the Site boundary during the non-breeding bird surveys.
- 6.3.53. Invertebrate scoping surveys identified parcels of very good bumblebee foraging habitat, with some areas also considered good broader invertebrate habitat. Large garden bumblebee *Bombus ruderalis*, a scarce bumblebee, was

recorded on-site. Further surveys would be undertaken in 2026, should habitat identified as potentially important for invertebrates remain within the Site boundary.

- 6.3.54. Bat activity surveys were undertaken in 2025. Four activity transects were undertaken, with complimentary acoustic monitoring at eight static locations. The Site (and surrounds) supports a limited number of trees and buildings that could be used by roosting bats. Anecdotal evidence from local residents suggests that bats are roosting within local dwellings, with sightings of bats foraging over residential gardens nearby. Although detailed analysis has not been completed, observations to date suggest that bat activity levels are low, as is typical of open habitats located close to open coastal habitats with limited corridors to more suitable bat habitat. The environmental conditions present along the Dungeness peninsular, including the open habitats and frequent high winds, do not provide optimal conditions for bats. Species identified to date include pipistrelle species (common and soprano), typically in ones or twos, foraging and commuting along linear features. To date, no Nathusius' pipistrelle have been recorded.
- 6.3.55. Great crested newt surveys would be undertaken in 2026, following design chill, when further information about the Proposed Development is available. The scope of assessment for GCN would then be tailored specifically to the potential impacts the Proposed Development may have upon GCN.
- 6.3.56. There were no fish records available within 2km of the Site boundary. The nearest sampling point within the Environment Agency Ecology and Fish Data Explorer⁸⁰ data is 7.5km north of the Site (>10km away following riparian habitat), within the Engine Sewer. A review of available data from the last 10 years returned seven records of fish including common bream *Abramis brama* (1), perch *Perca fluviatilis* (8), pike *Esox lucius* (2), roach *Rutilus rutilus* (57), rudd *Scardinius erythrophthalmus* (1), tench *Tinca tinca* (2), and European eel *Anguilla anguilla* (4). Fish habitat surveys may be required in 2026, dependent upon project design and potential impacts to watercourses. The scope of these surveys would be discussed with statutory consultees to ensure the level of survey is appropriate for the Proposed Development.

6.4. Predicted Future Baseline

- 6.4.1. This section considers the likely changes to the current baseline that may occur over the duration of the Proposed Development, in the absence of development.
- 6.4.2. The Site is dominated by arable fields used predominantly for crop production, with some agricultural grass leys. Many of the field boundaries are formed by a

⁸⁰ Environment Agency Ecology and Fish Data Explorer. Available at:
<https://environment.data.gov.uk/ecology/shiny/>

network of watercourses including field drains, ditches and rivers with few hedgerows evident within the landscape. Agricultural verges are characterised by grassland strips with modified grassland and other neutral grassland present.

- 6.4.3. In the absence of the Proposed Development, these habitats would be managed in the same way, continuing to provide habitat for those (limited) protected and notable species identified in the current baseline. With potential for legally controlled species to also occur. Some of these species have adapted to live successfully in agricultural habitats, such as badger and ground nesting birds.
- 6.4.4. Over the Proposed Development's operational lifespan, species populations and distributions would continue to fluctuate in response to standard agricultural management, such as crop rotation, grazing and dredging of field drains. As a result of intensive farming practices, many species within arable landscapes are in decline. Therefore, in the absence of the Proposed Development, it is likely that this trend would continue, with more common, widespread and adaptable species populations continuing to decrease.
- 6.4.5. In the longer term, changing climatic conditions resulting from 'climate change' may impact the resilience of certain crops, habitats and species, forcing farming practices to adapt. Due to the intensive nature of management within the arable landscape, climate change is unlikely to significantly impact the majority of land that occurs within the Site boundary during the lifetime of the Proposed Development.

Opportunities for Enhancing the Environment

- 6.4.6. The Proposed Development provides opportunities for delivering Biodiversity Net Gain (measured using the Department for Environment Food and Rural Affairs (DEFRA) Statutory Biodiversity Metric⁸¹ or relevant update) at a scale in keeping with the Lawton Principles⁸² (i.e. more, bigger, better and joined up) that would be explored further and confirmed in the ES. The scale of the Proposed Development allows for the opportunity to link fragmented habitats that would be managed in a way to promote biodiversity, providing the opportunity to join up with other habitats of value from further afield. At a local

81 Statutory Biodiversity Metric. Available at:

<https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>.

Accessed 23/10/2025.

82 Lawton Principles, within the Lawton Review - Lawton, J.H., Brotherton, P.N.M., Brown, V.K., Elphick, C., Fitter, A.H., Forshaw, J., Haddow, R.W., Hilborne, S., Leafe, R.N., Mace, G.M., Southgate, M.P., Sutherland, W.J., Tew, T.E., Varley, J., & Wynne, G.R. (2010) Making Space for Nature: a review of England's wildlife sites and ecological network. Report to Defra. Available at: <https://webarchive.nationalarchives.gov.uk/ukgwa/20130402151656/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf>. Accessed 23/10/2025.

scale, work is underway (with stakeholder engagement) to identify local conservation priorities and projects that should be considered for biodiversity enhancement. Certain land parcels within or close to the Site boundary currently support agri-environment prescriptions, which appear to be working well.

- 6.4.7. The size of the Site boundary provides an opportunity to provide biodiverse habitats across an area much larger than the size of a typical SSSI or LWS. Although the variety of habitats that could be created within the solar array would be limited, the opportunities that it could provide for invertebrates, breeding birds, herptiles and bats could be large enough to support notable changes in the size of local populations.
- 6.4.8. Within the Site boundary there would be three broad opportunities, these being:
- Habitat enhancement and creation outside of areas of development (i.e. non-developable land (and watercourses), land set aside for biodiversity and other green infrastructure);
 - Habitat enhancement and creation within areas of development; and
 - Species-specific opportunities aimed at improving local provision in-line with conservation strategies.
- 6.4.9. The Site boundaries' proximity to the Dungeness peninsula and specialised habitats that are present within the designated areas, means that the Site boundary provides an opportunity to seek to reinstate, create or enhance habitats that are of greater biodiversity value than are currently present within the Site boundary. While the design of the Proposed Development is at an early stage, measures could include the restoration of areas of coastal vegetated shingle (a national and local conservation priority), surrender of arable land to provide functionally linked land to the nearby designations, creation of scrapes and temporary pools for important invertebrate assemblages and great crested newts, improved management of watercourses within the Site boundary and the creation of new hedgerows (a HPI) and planting of new stands of scrub/woodland, should suitable growing environments be located within the Proposed Development. Salt-tolerant species of local provenance would be used to reduce failure within the establishment period.
- 6.4.10. There are opportunities within the Site boundary to create a range of habitats dependent on location. Around tracksides and in the stand-off between infrastructure and field boundaries, wild bird cover, conservation headlands and pollinator mixes sown in strips akin to current agri-environment schemes can be established. These would provide opportunities for a range of species including invertebrates, birds and bats through the provision of greater food resources. In other locations, species rich grassland can be created. The grassland can have a variety of different characters dependent on location and soil type (e.g. meadow style grasslands adjacent to solar arrays, with more shade and drought tolerant communities around the panels) and management types (e.g. different grazing and cutting regimes). The aim of the design would be to ensure a

sufficient range of different grassland types to ensure a variety of opportunities are available to local flora and fauna.

- 6.4.11. There is also the opportunity to create species or species group specific features to aid local conservation efforts. This could include the creation and management of invertebrate foraging habitats aimed at providing an increased food supply to rare and scarce invertebrates within the Site boundary, including some Hymenoptera categorised as SPI, hibernacula for herptiles (including some SPI) and enhancement of the existing ditch network for water vole (a national and local conservation priority).
- 6.4.12. Through the outputs of field survey work and technical engagement with nature conservation stakeholders, the measures likely to be of most conservation benefit and in line with local priorities would be identified. The Ecological Impact Assessment to be included as a Chapter within the ES, its appendices and related documents would provide information on how BNG and other biodiversity measures would be secured, as well as an outline of the proposed management and monitoring measures.

Ecological Features Identified

- 6.4.13. The ecological features⁸³ identified for consideration at the time of writing this Report are based on the desk study, the results of field surveys undertaken to date and professional judgement. Dependent on the outcome of further surveys and technical engagement, this list may need to be amended prior to detailed assessment work commencing. Ecological features have been identified that indicate the potential for effects (both negative and positive) to occur during the construction, operational or decommissioning phases of the Proposed Development.
- 6.4.14. The Study Area for the Ecological Impact Assessment (EcIA) has been defined as the Site boundary, plus the Zol that are identified in Table 6.1. Once details on the approach to construction, operation and decommissioning are available these Zol may be revised.
- 6.4.15. The ecological features requiring detailed assessment are:
- Internationally designated sites within and adjacent to the Site boundary and Zol;
 - Potentially functionally linked land⁸⁴ (FLL) within the Site boundary that supports features designated on internationally designated sites within the Zol;

⁸³ Ecological features are the term used within the CIEEM EcIA guidance to refer to important receptors.

⁸⁴ 'Functionally linked land' (FLL) is a term often used to describe areas of land or sea occurring outside a designated site which is considered to be critical to, or necessary for, the ecological or behavioural functions in a relevant season of a qualifying feature for which a Special Areas of Conservation (SAC)/ Special Protection Area (SPA)/ Ramsar site has been designated. These habitats are frequently used

- Nationally designated sites within and adjacent to the Site boundary and Zol;
- Local Wildlife Sites within the Zol;
- Habitats of Principal Importance – in particular rivers, hedgerows, CFPGM⁸⁵ and coastal vegetated shingle;
- Other habitats – including grassland, scrub, woodland, ditches, reedbed and ponds;
- The breeding bird community – particularly species noted on nearby designations or listed on the red and amber lists of Birds of Conservation Concern 5⁸⁶;
- Non-breeding birds – particularly species noted on nearby designations that have potential to use the Site boundary as FLL, assessment is dependent on type and distribution of species identified during the field survey;
- Bats – consideration particularly associated with fragmentation of, and habitat losses and gains in, areas of foraging opportunity;
- Invertebrates – with particular emphasis on legislative compliance (if any identified through surveys), and consideration particularly associated with fragmentation and losses and gains in habitat quality;
- Great crested newts – with emphasis on legislative compliance and welfare, and consideration of fragmentation, habitat loss and habitat gain;
- Badgers – with particular emphasis on legislative compliance and welfare;
- Riparian mammals – consideration particularly associated with fragmentation and losses and gains in habitat quality; and
- Macrophytes – consideration particularly associated with fragmentation and losses and gains in habitat quality.

6.5. Environmental Measures

- 6.5.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the Environmental Impact Assessment (EIA) Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to biodiversity would be identified and would be considered as part of

by SPA species and supports the functionality and integrity of the designated sites for these features. - [Identification of Functionally Linked Land supporting Special Protection Areas \(SPAs\) waterbirds in the North West of England - NECR361](#)

⁸⁵ It is noted that whilst CFPGM is present within the Site boundary according to the Priority Habitat Inventory mapping, the habitat present does not conform with the UK BAP Habitat Description.

⁸⁶ Stanbury, A.J., Eaton, M.A., Aebischer, N.J., Balmer, D., Brown, A.F., Douse, A., Lindley, P., MuCulloch, N., Noble, D.G. & Win, I. (2021) Birds of Conservation Concern 5. British Birds 114.

the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures would be implemented and included within the Proposed Development.

6.6. Scope of the Assessment

Consultation Undertaken to Date

- 6.6.1. An overview of consultation undertaken to date for biodiversity, and how this has informed the scope to the assessment, is provided in Table 6.2. Members of the Proposed Development project team also undertook an ecological walkover of part of the Site boundary with a land interest on Friday 25th September 2025. Further ongoing consultation would be undertaken with Natural England, The RSPB, Environment Agency and other interested parties, as necessary.

Table 6.2 Consultation Undertaken To Date

Date	Consultee	Summary
28/10/2025	Environment Agency (EA)	Second meeting with the EA and an introduction to technical specialists at the EA. The purpose of the meeting was to clarify the EA's position within the consultation process, discuss technical questions sent to the EA prior to the meeting, and agree on survey approaches going forward.
08/10/2025	Little Cheyne Court Windfarm	Introductory meeting to discuss the Little Cheyne Court (LCC) scheme and their landholding, technical ecological findings and lessons learned during their application process, post-works monitoring and on-going monitoring programmes that are underway within the LCC holding. This meeting also served as a chance to share South Brooks approach and direction of travel, including proposed mitigation offerings which offer collaboration opportunity.
10/09/2025	RSPB	Project presentation to RSPB showing the current Site boundary and working parameters. Run through of ecological surveys and findings to date, and proposed scope of assessment. Discussions regarding RSPB initial feedback with the Proposed Development and any local conservation opportunities the RSPB know of. Technical engagement regarding working within areas of vegetated shingle and any lessons learned from RSPB in this area. Agreed approach for further meetings to discuss scheme and opportunities.

03/09/2025	EA	Introductory meeting with the EA to discuss the Proposed Development and objectives of consultation. Consultation would be used to agree proportionate and appropriate approach to ecological impact assessment and habitats regulations assessment.
19/08/2025	Natural England	Introductory Discretionary Advice Service (DAS) meeting to discuss the Proposed Development and DAS agreement / objectives. DAS would be used to agree proportionate and appropriate approach to ecological impact assessment and habitats regulations assessment.
12/08/2024	Royal Society for Protection of Birds (RSPB)	Introductory meeting with RSPB to discuss potential solar development in proximity to Dungeness.

Effects Scoped Out from Detailed Assessment

- 6.6.2. Emissions from plant and delivery traffic during the construction phase can lead to habitat changes through nutrient deposition, acidification and direct toxicity. There are designated areas within and adjacent to the Site boundary, however emissions from construction traffic within these areas would be negligible. This effect is proposed to be scoped out of the assessment, in line with Natural England Advisory Note (NEA001)⁸⁷ due to the short-lived nature of effects from which the sites/features can quickly recover. This justification equally applies to non-designated sites present within the area. During the operational phase, maximum traffic movements are expected to be no greater than several light van journeys per day; therefore, operational emissions can also be discounted.
- 6.6.3. The effects of electro-magnetic fields (EMF) from buried cables during operation can result in environmental changes in close proximity to cables through soil heating (altering habitat composition) and magnetic fields discouraging certain species from moving through the area. However, cabling for solar farms is no different to those already in position across the country (e.g. connections for onshore and offshore wind farms, parts of the national grid and distribution networks and other solar farms) that may have no effect on ecological features. Heating of the soil would occur over a small area only, with typical estimates of measurable changes in temperature being at most between 1 and 1.5m from the cable, thus making any potential effect highly localised. As a consequence, it is proposed that consideration of these effects is scoped out of the assessment. Further information is provided in **Chapter 19: Environmental Topics Scoped Out**.

⁸⁷ Natural England Advisory Note NEA001. Available at:
<https://publications.naturalengland.org.uk/publication/4720542048845824>

Likely Significant Effects Scoped into the Detailed Assessment

- 6.6.4. The construction, operational (including operational replacement) and decommissioning phases of a solar farm may result in a range of potentially significant effects that require detailed assessment, which include:
- Temporary land take and habitat degradation during construction;
 - Permanent land take and habitat loss / degradation associated with presence of permanent infrastructure during operation;
 - Fragmentation of semi-natural habitats due to habitat loss / degradation and reduction in landscape permeability due to the presence of infrastructure during construction and operation;
 - Increases in noise, vibration and human presence during the construction phase resulting in disturbance of fauna;
 - Increases in temporary and permanent lighting through all phases of the Proposed Development resulting in disturbance of fauna;
 - Changes in ground water levels and surface water movement patterns due to imposition of temporary and permanent drainage resulting in habitat degradation during construction and operation;
 - Accidental spread of invasive non-native species due to construction activity during construction phase;
 - Pollution of terrestrial and freshwater habitats through loss of chemicals and fines / dust from the Site, particularly during construction, with some potential during decommissioning; and
 - Changes in hydrology (ground water levels and surface water run-off rates) resulting in habitat change during operation.

6.7. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 6.7.1. Some baseline surveys including non-breeding bird surveys, invertebrate survey, macrophyte and great crested newt survey, are either on-going, or not yet fully scoped. Additionally, further baseline data required to inform the assessment is detailed below. It should, however, be noted that the processing of field data gathered to date may suggest that further survey effort is required.
- 6.7.2. The following additional surveys may be required depending on the development design:
- Hedgerow survey (based on the Hedgerows Regulations 1997) in any locations where hedgerows may require removal (this is expected to be

minimal and largely associated with widening existing field access points if necessary);

- Additional otter and water vole survey in any locations where work within (or close to) watercourses is required to facilitate the delivery of construction tracks / Site access;
- Macrophyte surveys to identify ditches important for macrophyte assemblages;
- Invertebrate surveys to identify and assess any important areas for invertebrates that have the potential to be impacted by the Proposed Development;
- Great crested newt (GCN) surveys in locations where there is potential for direct or indirect impact to GCN; and
- Fish habitat surveys at crossing locations to assess potential for migratory fish.

6.7.3. It is not currently considered necessary to repeat any other surveys to provide additional data.

6.8. Approach to Ecological Impact Assessment

6.8.1. The approach to EclA follows the guidance published by CIEEM (2018, updated 2022) although changes in terminology and structure would be adopted where reasonable to conform with the general approach used within other technical chapters within the Environmental Statement (ES).

6.8.2. The first stage in the assessment is to determine the importance of the ecological features identified on the Site or within the Zol. The CIEEM guidance requires that each ecological feature is conferred importance against a geographic scale. The level of importance is conferred by the relation of the ecological feature to UK legislation and policy. The geographical levels that would be considered for the assessment of the Proposed Development are:

- International;
- National (i.e. UK / England);
- County (i.e. Kent and Sussex);
- District (i.e. Rother, Folkestone and Hythe);
- Local (i.e. the Site boundary and immediate surrounds); and
- Negligible.

- 6.8.3. This level of importance would also be qualified with a secondary geographic scale (using the same terminology) to highlight where a project level effect may operate on a smaller scale only (e.g. effects that could alter the status of a local population, but remain negligible at a regional or national level). This judgement would be informed by information on the extent of habitat and / or population size, population trends and distribution of the ecological features in question.
- 6.8.4. All ecological features determined to be of negligible importance would automatically be excluded from detailed assessment, with the exception of legally protected species for which mitigation measures may be required to ensure compliance with legislation.
- 6.8.5. Ecological features of local importance or above would then be considered individually for inclusion within the detailed assessment. Through an understanding of the activities associated with the Proposed Development and the resulting environmental changes, it is possible to identify ecological features that may be subject to potentially significant effects. Where no potential for significant effects is identified, following the imposition of typical project level embedded mitigation measures (e.g. pollution prevention measures), ecological features would be scoped out of further detailed assessment.
- 6.8.6. Those ecological features taken forward for more detailed assessment would be considered in line with CIEEM guidelines. CIEEM (2018, updated 2022) defines a significant effect as one 'that either supports or undermines biodiversity conservation objectives for 'important ecological features' or for biodiversity in general'.
- 6.8.7. When considering likely significant effects on ecological features, whether these are negative or positive, the following characteristics of environmental change would be taken into account:
- extent – the spatial or geographical area over which the environmental change may occur;
 - magnitude – the size, amount, intensity or volume of the environmental change;
 - duration – the length of time over which the environmental change may occur;
 - frequency – the number of times an environmental change may occur;
 - timing – the periods of the day / year / season during which an environmental change may occur; and
 - reversibility – whether the environmental change can be reversed through restoration actions or regeneration.

- 6.8.8. Both negative and positive effects are assessed as being significant if the favourable conservation status of an ecological feature would be altered as a result of the Proposed Development. Conservation status is defined in CIEEM 2018 (in paragraph 5.3.2) as follows:
- ‘habitats – conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area’; and
 - ‘species – conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area’.
- 6.8.9. Professional judgement would be used, considering the available evidence, to determine whether the conservation status of an ecological feature would be altered either negatively or positively as a result of the Proposed Development.
- 6.8.10. When considering designated sites, it is the potential effects on their integrity that are assessed during Habitats Regulations Assessments⁸⁸. The integrity of a designated site is defined as ‘the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified.’
- 6.8.11. The assessment of effects on integrity would draw upon the assessment of effects on the conservation status of the features for which the Site has been designated.
- 6.8.12. Where likely adverse effects are identified, environmental measures, including mitigation, would be incorporated into the project where practicable. These would be described in detail, including providing information on how they would be secured and their expected efficacy.
- 6.8.13. Each ecological feature would be considered across all phases of the Proposed Development to ensure potential outcomes are considered realistically.
- 6.8.14. The approach to assessing cumulative and in-combination effects is considered as part of **Chapter 5: Approach to EIA**.

Assumptions and Limitations

- 6.8.15. Baseline data collection is currently ongoing to provide comprehensive ecological information sufficient to underpin a detailed ecological assessment of

⁸⁸ Appropriate Assessment as part of Habitats Regulations Assessment. Available at: <https://www.gov.uk/guidance/appropriate-assessment>. Accessed 23/10/2025.

the Proposed Development. The information gathered to date, whilst incomplete, is considered sufficient to inform the EIA Scoping process.

7. Hydrology

7.1. Introduction

- 7.1.1. This Chapter of the Scoping Report presents the scope of detailed environmental assessment for Hydrology for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this Scoping Chapter and an overview of the relevant baseline conditions within the Site and surrounding area. It concludes by setting out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that will be used to undertake the detailed environmental assessment.

7.2. Review of Policy, Legislation, and Relevant Guidance

- 7.2.1. Legislation, planning policy and guidance relating to Hydrology required for and relevant to the Proposed Development comprises:

Legislation

- The European Water Framework Directive (WFD) 2000/60/EC⁸⁹;
- The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017⁹⁰;
- Flood Directive 2007⁹¹;
- Environmental Protection Act 1990⁹²;
- Flood and Water Management Act 2010⁹³
- Water Resources Act 1991 (as amended 2009)⁹⁴;
- Land Drainage Act 1991⁹⁵;
- Environment Act 2021⁹⁶;
- Water Act 2014⁹⁷;
- The Environmental Damage (Prevention and Remediation) (England) Regulations 2015⁹⁸

⁸⁹ European Commission, Water Framework Directive. 2000. Available at: https://environment.ec.europa.eu/topics/water/water-framework-directive_en

⁹⁰ UK Statutory Instruments, 2017. Available at: <https://www.legislation.gov.uk/ukSI/2017/407/contents>

⁹¹ European Parliament Flood Directive, 2007. Available at: <https://www.legislation.gov.uk/eudr/2007/60>

⁹² UK Public General Act, 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>

⁹³ UK Public General Acts, 2010. Available at: <https://www.legislation.gov.uk/ukpga/2010/29/contents>

⁹⁴ UK Statutory Instruments, 2009. Available at: <https://www.legislation.gov.uk/ukSI/2009/3104/contents>

⁹⁵ UK Public General Acts, 1991. Available at: <https://www.legislation.gov.uk/ukpga/1991/59/contents>

⁹⁶ UK Public General Acts, 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

⁹⁷ UK Public General Acts, 2014. Available at: <https://www.legislation.gov.uk/ukpga/2014/21/contents>

⁹⁸ UK Statutory Instruments. Available at: <https://www.legislation.gov.uk/ukSI/2015/810/contents>

- The Groundwater (England and Wales) Regulations 2009⁹⁹;
- The Pollution Prevention and Control (England and Wales) Regulations 2000 (note: 2000 version has been revoked, reference has been made to the Pollution Prevention and Control Act 1999)¹⁰⁰;
- The Private Water Supplies (England) (Amendment) Regulations 2018¹⁰¹;
- The Water Supply (Water Quality) Regulations 2018¹⁰²;
- The Environmental Permitting (England and Wales) Regulations 2016¹⁰³.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) 2023¹⁰⁴ – specific reference to the following:
 - Section 5.6, which relates to Coastal Change;
 - Section 5.8, which relates to Flood Risk;
 - Section 5.16, which relates to Water Quality and Resources;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) 2025¹⁰⁵ – specifically paragraphs 2.4.11 and Section 2.10;
- National Policy Statement for Electricity Networks Infrastructure (EN-5) 2025¹⁰⁶; and
- National Planning Policy Framework (NPPF) updated February 2025 – specific reference to Section 14¹⁰⁷.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan, Adopted September 2020¹⁰⁸, specifically:
 - Policy CC6: Solar Farms Core Strategy Policy
 - Policy SS3: Place-Shaping and Sustainable Settlements Strategy
 - Local Plan Policy NE8: Integrated Coastal Zone Management

⁹⁹ UK Statutory Instruments, 2009. Available at: <https://www.legislation.gov.uk/ukSI/2009/2902/contents/made>

¹⁰⁰ UK Public General Acts, 1999. Available at: <https://www.legislation.gov.uk/ukpga/1999/24/contents>

¹⁰¹ UK Statutory Instruments, 2009. Available at: <https://www.legislation.gov.uk/ukSI/2018/707/contents/made>

¹⁰² Wales Statutory Instruments, 2018. Available at: <https://www.legislation.gov.uk/wsi/2018/647/contents>

¹⁰³ UK Statutory Instruments, 2016. Available at: <https://www.legislation.gov.uk/ukSI/2016/1154/contents>

¹⁰⁴ Department for Energy Security and Net Zero, 2023. Available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

¹⁰⁵ Department for Energy Security and Net Zero, 2025. Available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3>

¹⁰⁶ Department for Energy Security and Net Zero, 2025. Available at: <https://assets.publishing.service.gov.uk/media/681dda13c66deec8488f7e66/draft-nps-en-5-electricity-networks-infrastructure.pdf>

¹⁰⁷ Ministry of Housing, Communities and Local Government, 2025. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁰⁸ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

- Local Plan Policy NE9: Development Around The Coast;
- Folkestone and Hythe District Council Core Strategy Review, Adopted March 2022¹⁰⁹; specifically:
 - Policy CSD5 Water and Coastal Environmental Management
 - Policy CSD8 New Romney Strategy;
- Kent Minerals and Waste Local Plan 2024-2039, Adopted March 2025¹¹⁰, specifically Policy DM10 'Water Environment';
- Rother Local Plan, Core Strategy, September 2014¹¹¹, specifically:
 - Policy EN6: Flood Risk Management
 - Policy EN7: Flood Risk and Development;
- Rother Local Plan 2020 – 2040, Draft (Regulation 18) Version, April 2024¹¹², specifically:
 - Policy ENV1: Coastal, Water and Flood Risk Management
 - Policy ENV2: Sustainable Surface Water Drainage;
- Kent County Council, Drainage and Planning Policy Statement, June 2017¹¹³, specifically chapters 5.2 and 5.3; and
- Kent County Council, Land Drainage Policy, December 2019¹¹⁴.

National Guidance

- Control of Water Pollution from Construction Sites: Guidance for Consultants and Contractors C532¹¹⁵;
- Environmental Good Practice on Site CIRIA 5th Edition¹¹⁶;
- Control of Water Pollution from Linear Construction Projects: Technical Guidance C648¹¹⁷;
- Guidance on Road Construction and Maintenance (Forests and Water Guidelines 5th Edition, 2011) Forestry Commission¹¹⁸;

¹⁰⁹Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

¹¹⁰ Kent County Council, 2025. Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

¹¹¹ Rother District Council, 2014. Available at: <https://rdcpublish.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

¹¹² Rother District Council, April 2024. Available at: https://rdcpublish.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan-Reg-18_version_Final.pdf

¹¹³ Kent County Council, June 2017. Available at: <https://www.folkestone-hythe.gov.uk/downloads/file/2242/106-kcc-drainage-and-planning-policy-statement-2017>

¹¹⁴ Kent County Council, December 2019. Available at: https://www.kent.gov.uk/_data/assets/pdf_file/0018/205605/Land-drainage-policy.pdf

¹¹⁵ CIRIA, 2001. Available at: https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C532

¹¹⁶ CIRIA, 2023. Available at: <https://www.ciria.org/ItemDetail?iProductCode=C811d&Category=DOWNLOAD>

¹¹⁷ CIRIA, 2006. Available at: https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C648&Category=BOOK

¹¹⁸ UK Forestry Standard Guidelines, 2011. Available at: https://cdn.forestryresearch.gov.uk/2006/03/ukfs_water_fcgl007.pdf

- National Highways Design Manual for Roads and Bridges (DMRB)¹¹⁹;
- Planning Practice Guidance (PPG) 2024 Flood Risk and Coastal Change (updated 2025)¹²⁰;
- Environment Agency, Flood Risk Assessments applying for planning permission 2025¹²¹;
- Protect groundwater and prevent groundwater pollution guidance 2025¹²²;
- Nationally Significant Infrastructure Projects: Advice on the Water Framework Directive 2025¹²³;
- DEFRA Non-statutory technical standards for sustainable drainage systems 2015¹²⁴; and
- Construction Industry Research and Information Association (CIRIA) Report C753 The SuDS Manual 2015¹²⁵.

Local Guidance

- Rother District Level 1 Strategic Flood Risk Assessment (SFRA), February 2021¹²⁶;
- Shepway District Council (now Folkestone and Hythe District Council), Strategic Flood Risk Assessment (SFRA), July 2015¹²⁷;
- Kent and Medway Shoreline Pollution Emergency Plan, January 2023¹²⁸; and
- Kent County Council Local Flood Risk Management Strategy 2024 to 2034, June 2024¹²⁹;

7.3. Existing Baseline Conditions

- 7.3.1. This section of the Scoping Chapter for Hydrology sets out the known baseline conditions at this stage of the project. It is noted that further surveys and

¹¹⁹ National Highways, 2020. Available at: <https://nationalhighways.co.uk/suppliers/design-standards-and-specifications/design-manual-for-roads-and-bridges-dmr/>

¹²⁰ Ministry of Housing, Communities and Local Government, 2025. Available at: <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

¹²¹ Environment Agency, 2025. Available at: <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>

¹²² Environment Agency, 2025. Available at: <https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution>

¹²³ Planning Inspectorate, 2025. Available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-the-water-framework-directive>

¹²⁴ Department for Environment, Food and Rural Affairs, July 2025. Available at: <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems>

¹²⁵ CIRIA, 2015. Available at: https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C753

¹²⁶ Rother District Council, February 2021. Available at: https://rdcpublic.blob.core.windows.net/website-uploads/2022/06/Rother_District_SFRA_Level1_2021.pdf

¹²⁷ Folkestone and Hythe District Council, July 2015. Available at: <https://www.folkestone-hythe.gov.uk/downloads/download/102/strategic-flood-risk-assessments>

¹²⁸ Kent County Council, January 2023. Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/economic-regeneration-and-planning-policies/planning-policies/flooding-drainage-and-water-management-policies-and-guidance/kent-and-medway-shoreline-pollution-emergency-plan>

¹²⁹ Kent County Council, June 2024. Available at: <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/economic-regeneration-and-planning-policies/planning-policies/flooding-drainage-and-water-management-policies-and-guidance/local-flood-risk-management-strategy>

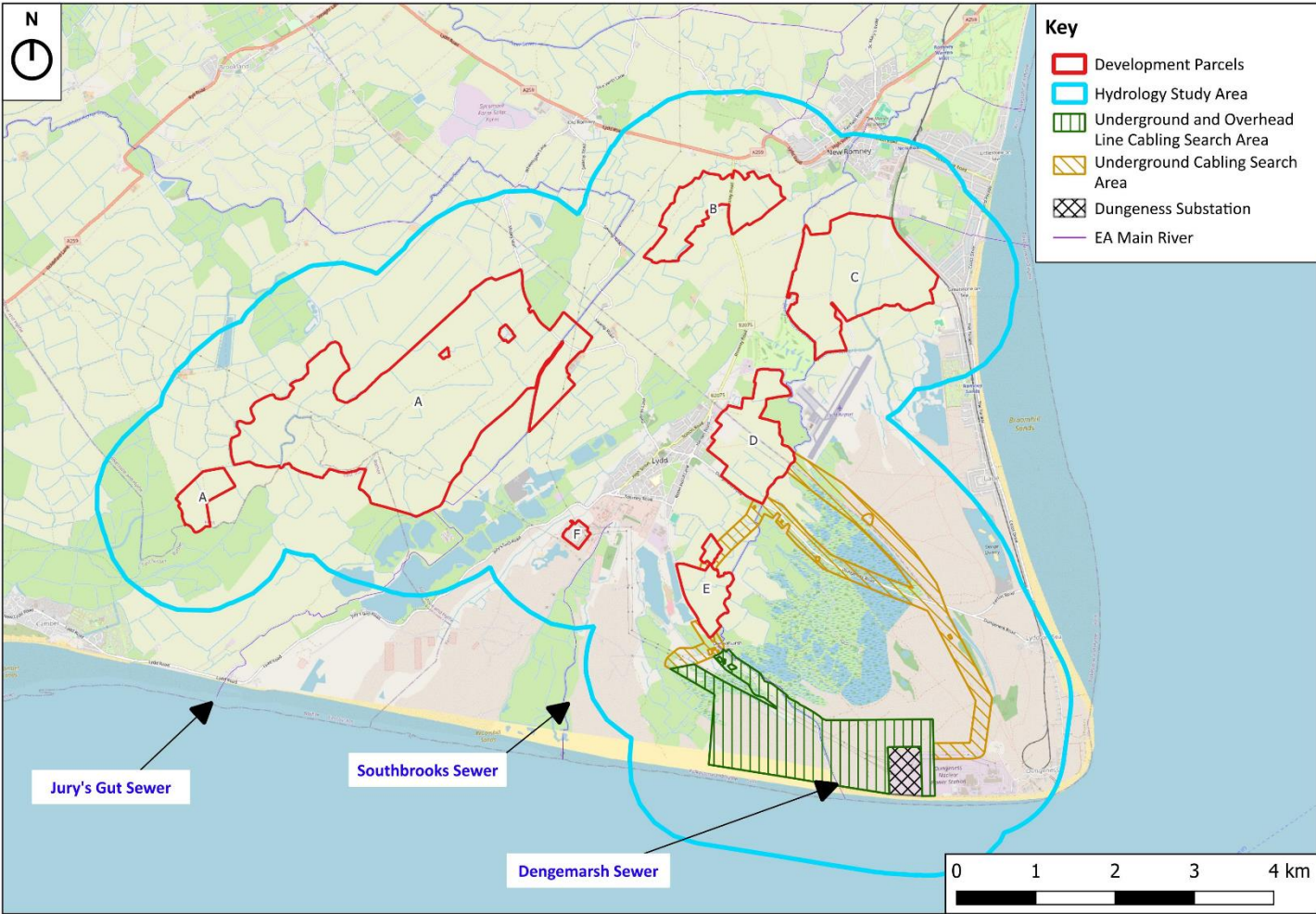
assessment is proposed to inform the technical assessment for the Environmental Statement (see details and scope of the further baseline data below under Section 7.7).

7.4. Study Area

- 7.4.1. Given the nature of hydrology, it is difficult to accurately define a study area as water is a flowing element. Therefore, in the absence of any specific guidance relating to solar developments and in accordance with Design Manual for Roads and Bridges (DMRB) LA 113 2020¹³⁰, a 1 km buffer from the Site boundary has been considered appropriate, as sufficient distance is provided to encompass catchments associated with the Proposed Development and to enable the deposition of silts in overland flows and dilution of any concentrated pollutants. Any impacts to waterbodies beyond 1 km from Site boundary are considered to be negligible. The Site boundary is shown in **Figure 2.1 within Appendix E**.
- 7.4.2. Off Site areas are defined as areas within a 1km buffer from the red line boundary. The Study Area is therefore defined as all areas encompassed within the Site boundary and off-site areas. The Study Area is shown in **Figure 7.1**, where the Study Area is mentioned within this Scoping Chapter it will relate specifically to Hydrology only.

¹³⁰ Standards for Highways, 2020. Available at: <https://www.standardsforhighways.co.uk/search/d6388f5f-2694-4986-ac46-b17b62c21727>

Figure 7.1 Hydrology Study Area



Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agwJnXietboAGA> (Accessed 31st October 2025)

- 7.4.3. The chosen cable route option will be encompassed within the Study Area and will connect to the Dungeness National Grid Substation located on the coast to the southeast. Options for overhead or underground cable routing will be assessed subject to further environmental engineering and design. Furthermore, it is anticipated that existing roads and crossings within the Study Area will be used for access options where appropriate, and upgrade works would be undertaken to utilise these if necessary.
- 7.4.4. It is noted that the study area will differ for the WFD screening assessment. The study area in this instance would be known as the Zone of Influence (Zol) and would capture all elements of the activities of the Proposed Development which will affect waterbodies. The Zol will be appropriately identified in line with the scale and nature of the development. At this stage the Zol has not been identified but will be once the detailed technical assessments begin.

7.5. Approach to the Collection of Baseline Data for Scoping

- 7.5.1. Baseline data was collected using the following sources:

- Ordnance Survey (OS) and British Geological Survey (BGS) Mapping, geological and borehole mapping¹³¹;
- DEFRA LiDAR 1m Topographic Dataset¹³²;
- Environment Agency (EA) Watercourse Mapping¹³³;
- EA Asset Management Mapping¹³⁴;
- EA Flood Map for Planning¹³⁵;
- EA Risk of Flooding from Surface Water Mapping¹³⁶;
- EA Reservoir Flood Risk Mapping¹³⁷;
- EA Historic Flood Maps¹³⁸;
- EA Groundwater Vulnerability Mapping¹³⁹;
- EA Source Protection Zone Mapping¹⁴⁰;

¹³¹ British Geological Survey GeoIndex Onshore. Available at:

https://mapapps2.bgs.ac.uk/geoindex/home.html?_ga=2.214711319.1075902138.1751972686-410814623.1751972686

¹³² Department for Environment Food and Rural Affairs. Available at: <https://environment.data.gov.uk/survey>

¹³³ Environment Agency. Available at: <https://www.data.gov.uk/dataset/4ae8ba46-f9a4-47d0-8d93-0f93eb494540/statutory-main-river-map>

¹³⁴ Department for Environment Food and Rural Affairs. Available at: <https://environment.data.gov.uk/asset-management/index.html>

¹³⁵ Environment Agency. Available at: <https://flood-map-for-planning.service.gov.uk/>

¹³⁶ Environment Agency. Available at: <https://check-long-term-flood-risk.service.gov.uk/postcode>

¹³⁷ Environment Agency. Available at: <https://www.data.gov.uk/dataset/44b9df6e-c1d4-40e9-98eb-bb3698ecb076/risk-of-flooding-from-reservoirs-maximum-flood-extent-web-mapping-service>

¹³⁸ Environment Agency. Available at: <https://www.data.gov.uk/dataset/76292bec-7d8b-43e8-9c98-02734fd89c81/historic-flood-map1>

¹³⁹ Environment Agency. Available at: <https://www.data.gov.uk/dataset/42d7d021-538c-46e2-abb6-644e01c63551/groundwater-vulnerability-maps-2017-on-magic>

¹⁴⁰ Environment Agency. Available at: <https://www.data.gov.uk/dataset/09889a48-0439-4bbe-8f2a-87bba26fbf5/source-protection-zones-merged1>

- EA Drinking Water Protected Areas (Surface Water)¹⁴¹;
- EA Drinking Water Safeguard Zones (for Surface Water and Groundwater)¹⁴²;
- EA Water Framework Directive River Basin Management Plans and Catchment Data Explorer¹⁴³;
- Rother Level 1 SFRA¹⁴⁴;
- Shepway District Council (now Folkestone and Hythe) SFRA¹⁴⁵;
- LandIS – Soilscales¹⁴⁶;
- CEH: Flood Estimation Handbook (FEH) Web Service¹⁴⁷.

7.5.2. The following project specific surveys were undertaken:

- Site Walkover 2024 – walking survey around the Romney Marshes area and Lydd to identify flood defence infrastructure, main rivers, watercourses, ditches, embankments, natural flood defences, topography all at a high level to inform initial assessments of the Site and Study Area.

7.6. Relevant Baseline Conditions for Scoping

Topography and Land Use

- 7.6.1. The Site is located in the southeast of England and in close proximity to the coast at Dungeness and Lydd with land uses across Site boundary generally comprising agricultural land.
- 7.6.2. Whilst Site boundary is spread across six land parcels (named South Brooks A-F, see **Figure 2.1 within Appendix E**), the land is generally very low lying with ground levels ranging between 1m Above Ordnance Datum (AOD) to 5m AOD. Ground levels within each land parcel are relatively flat with minimal fluctuation across their extents. The largest ground level differences are found between the watercourses and the neighbouring fields. LiDAR indicates that existing watercourses across Site boundary are between 0.5m to 2m deep.

Surface Hydrology, Watercourses and Hydrogeology

Water Framework Directive Waterbodies

¹⁴¹ Environment Agency. Available at: <https://www.data.gov.uk/dataset/3d136e9a-78cf-4452-824d-39d715ba5b69/drinking-water-protected-areas-surface-water>

¹⁴² Environment Agency. Available at: <https://www.data.gov.uk/dataset/6ac22521-2e77-4dc8-ba90-6bb55d2ea3b8/drinking-water-safeguard-zones-surface-water>, <https://www.data.gov.uk/dataset/7fe90245-d6e8-4d7c-a13a-65a87455f429/drinking-water-safeguard-zones-groundwater>

¹⁴³ Environment Agency. Available at: <https://environment.data.gov.uk/catchment-planning>

¹⁴⁴ Rother District Council, 2021. Available at: <https://www.rother.gov.uk/planning-and-building-control/planning-policy/emerging-local-plan/emerging-evidence-base/strategic-flood-risk-assessment-sfra/>

¹⁴⁵ Folkestone and Hythe District Council, 2015. Available at: <https://www.folkestone-hythe.gov.uk/downloads/download/102/strategic-flood-risk-assessments>

¹⁴⁶ LandIS. Available at: <https://www.landis.org.uk/soilscales/>

¹⁴⁷ UK Centre for Ecology and Hydrology. Available at: <https://fehweb.ceh.ac.uk/>

- 7.6.3. Information hosted online by DEFRA's Catchment Data Explorer¹⁴⁸ indicates that Site boundary lies within the Romney Marsh South operational catchment within the Rother Management catchment.
- 7.6.4. The designated WFD river surface waterbodies within the Study Area are:
- Walland Marsh at East Guldeford (GB107040013420) – Artificial hydromorphological designation, moderate ecological status
 - White Kemp and Jury's Gut Sewer (GB107040013470) – Artificial hydromorphological designation, moderate ecological status
 - Dengemarsh Sewer (GB107040013450). – Artificial hydromorphological designation, moderate ecological status
- 7.6.5. In the absence of detailed topographical surveys of the entire Romney Marshes South operational catchment, it is assumed that South Brooks A-F drain to surface waterbodies as detailed below:
- The majority of South Brooks A drains to the Walland Marsh and East Guldeford waterbody, a small portion of the northeast of South Brooks A drains to the White Kemp and Jury's Gut Sewer waterbody.
 - The majority of South Brooks B and the entirety of 'South Brooks F' drains to the White Kemp and Jury's Gut Sewer waterbody. The northern part of 'South Brooks B' drains to the Dengemarsh Sewer.
 - The entirety of South Brooks C, D and E drain to the Dengemarsh Sewer.
- 7.6.6. There are a number of identified WFD lake waterbodies throughout the operational catchment area and within the Study Area. The only WFD lake waterbody within the Study Area is Hookers Pit which will be formally assessed. The following WFD lake waterbodies lie within 2 km of Site boundary and will be considered for assessment:
- Burrows Pit;
 - Dungeness Gravel Pit;
 - Greatstone Lake;
 - Long Pit; and
 - Romney Warren Pond.

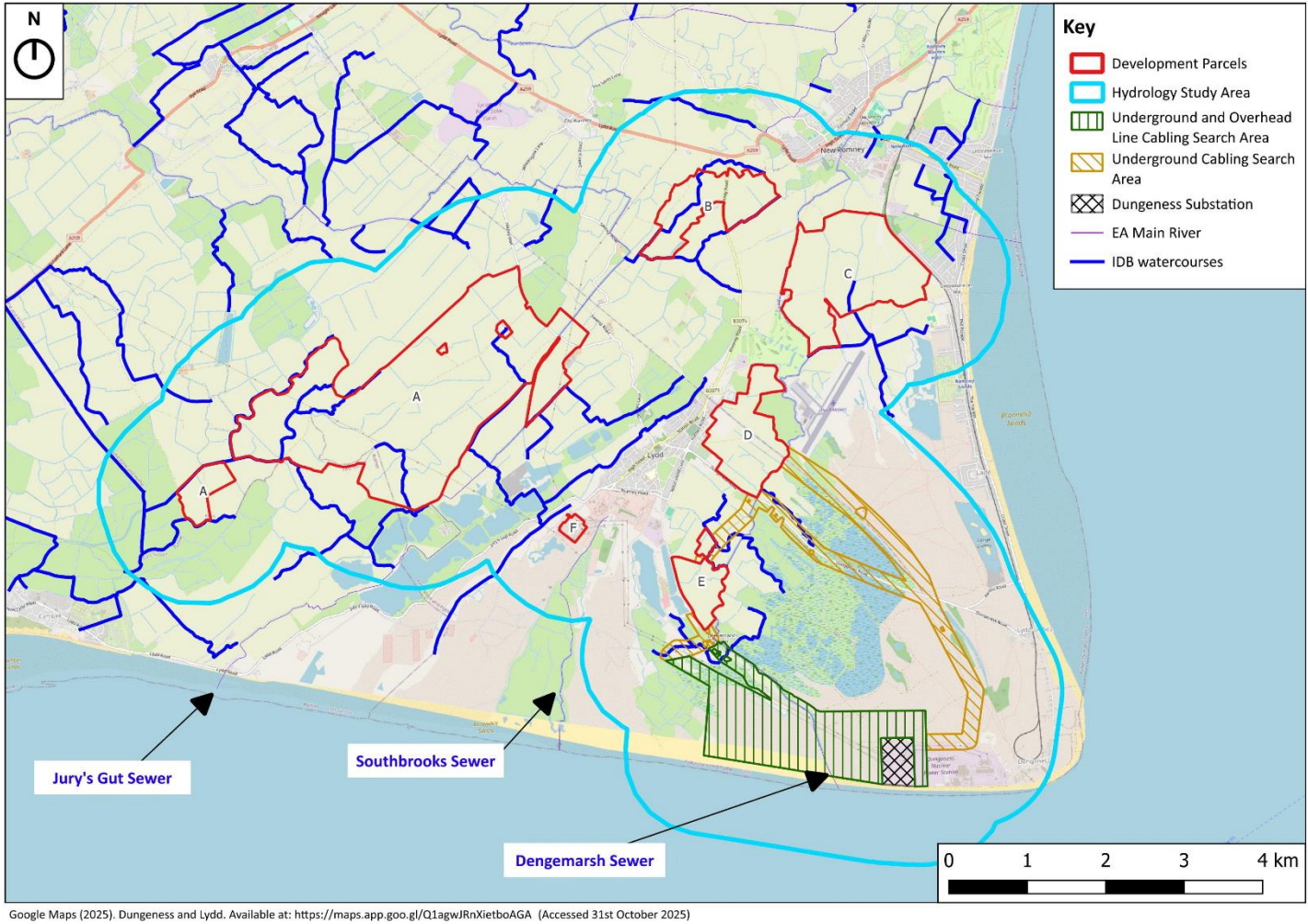
Watercourses

- 7.6.7. There are a number of main rivers, ordinary watercourses and ditches within the Study Area.

¹⁴⁸ Department for Environment, Food and Rural Affairs. Available at: <https://environment.data.gov.uk/catchment-planning>

- 7.6.8. All currently identified watercourses (main rivers and Romney Marshes Internal Drainage Board (RMIDB) watercourses) relevant to the Study Area are shown in **Figure 7.2**.

Figure 7.2 Currently Identified Watercourses



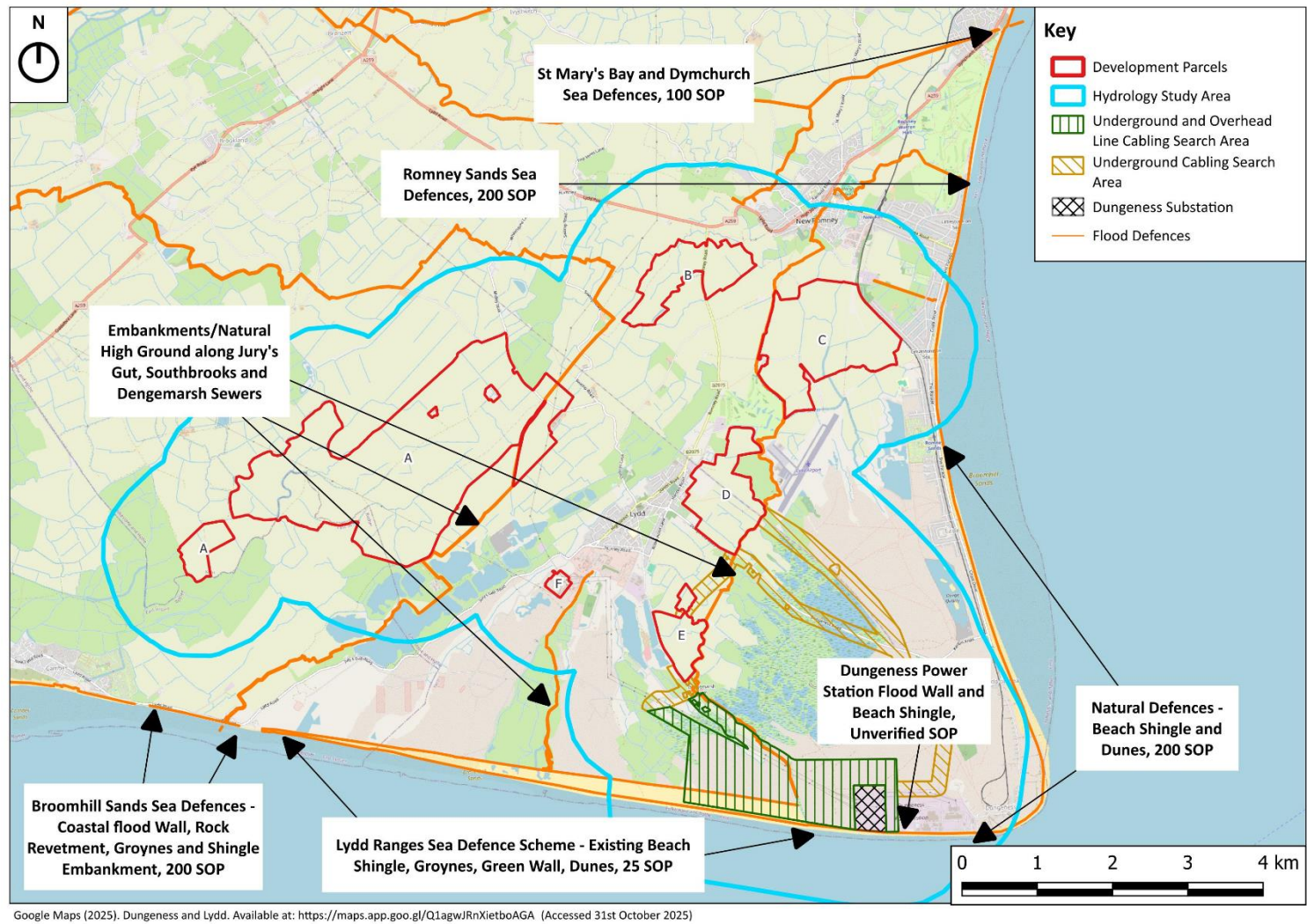
- 7.6.9. The designated main rivers located within the Study Area comprise the White Kemp and Jury's Gut Sewer, Southbrooks Sewer and Dengemarsh Sewer. It is noted that while the Southbrooks Sewer is shown to be a main river, the online asset information management records indicate that it is privately managed. Both the White Kemp and Jury's Gut Sewer and Dengemarsh Sewer are managed by the EA.
- 7.6.10. Drainage within the Study Area is managed by the RMIDB, and their watercourses help to facilitate this within the Romney Marshes South operational catchment. Local RMIDB watercourses will drain surface water to the WFD river surface waterbodies as detailed in 7.6.5.
- 7.6.11. The RMIDB will carry out operation, maintenance and improvement works where necessary for both EA and RMIDB assets. Priority is given to IDB watercourses as these are considered to be the most important as they largely manage local drainage. Given the limited resources the IDB have, appropriate allocation of works is essential¹⁴⁹. The ultimate responsibility of other watercourses within the RMIDB district lie with the respective riparian owners. The RMIDB will assist landowners where resources are available.

Flood Defences and Structures

- 7.6.12. There are a number of coastal and river defences in the Romney Marshes area. Refer to **Figure 7.3** showing flood defence locations. All defences are maintained by the EA excluding defences to the south of the Dungeness Power Station (which are privately managed) within the Romney Marshes area. While some flood defences lie outside of the Study Area, flood defence infrastructure plays a major within the peninsular of the Romney Marsh area. As described in 7.7.2, the land within the Romney Marshes is very low lying. Low lying land allows for flood waters to spread out over large distances in the absence of flood defences. The EA flood defences afford protection to Site boundary and the vast majority of the Romney Marsh area as a whole.

¹⁴⁹ Romney Marshes Internal Drainage Board, Policy Statement on Water Level and Flood Risk Management. Available at: <https://www.rmaidb.co.uk/romney-marsh-area/policy-statement/>

Figure 7.3 Flood Defence Locations



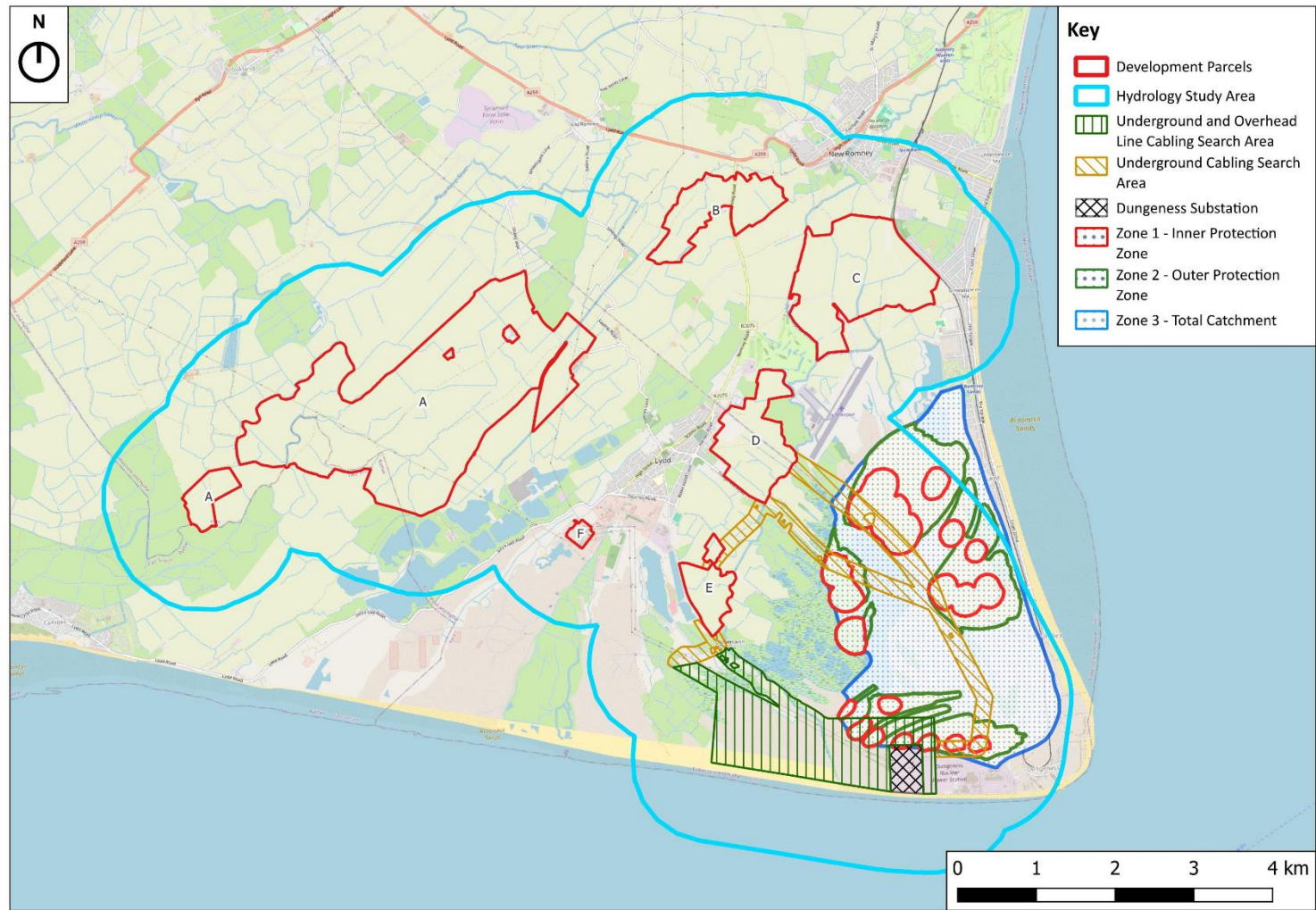
- 7.6.13. EA flood defences are present along the entire coast, notable defences towards the south of the Study Area include the following:
- Broomhill Sands Sea Defence – consisting of flood walls, groynes and dunes/beach.
 - Lydd Ranges Sea Defence Scheme – consisting of flood walls, rock revetments, groynes, ‘Green Wall’ (natural embankment and dunes/beach).
- 7.6.14. Flood defences along the coast range in their Standard of Protection (SoP). The SoP is defined as the flood event for which defences provide protection. For example, a SoP of 1 in 200 ensures that all flood events (i.e. 1 in 20 year, 1 in 50 year etc.) up to and including the 1 in 200-year flood event are protected against. In this instance the EA manage the SoP of defences in the area to ensure the SoP is maintained. Through detailed hydraulic modelling and regular inspection, required updates or repairs to defences can be identified and implemented where appropriate subject to funding.
- 7.6.15. In the Romney Marshes area, where flood walls and hard engineering are present, a SoP of the 1 in 200-year event is provided. Where more natural defences such as the green wall, dunes and embankments are present, a SoP of up to the 1 in 25-year event is provided. Refer to **Figure 7.3** for identified SoPs for flood defences.
- 7.6.16. EA flood defences are also present along all main rivers mentioned in 7.7.9. These consist of raised embankments and flow control structures which manage the flow of water within the main rivers.

Hydrogeology

- 7.6.17. Online 1:50,000 British Geological Survey (BGS) mapping shows that Site boundary is entirely underlain by the Hastings Beds of Sandstone, Siltstone and Shales bedrock geology and superficial deposits of Tidal Flat deposits of Clay and Silt as well as Storm Beach deposits of Gravel. Given proximity of Site boundary to the coast, the permeable nature of the underlying geology and the low-lying land, a high water table is expected.
- 7.6.18. The BGS Aquifer designation dataset for England and Wales provided on the MAGIC website¹⁵⁰ indicates the bedrock is classified as a Secondary A aquifer and the superficial deposits are also classified as Secondary A aquifer. EA groundwater vulnerability maps on MAGIC indicate aquifer vulnerability as being low to medium.
- 7.6.19. A cluster of SPZs, including zones 1 to 3, are located within the Study Area. Refer to **Figure 7.4** for the location of SPZs.

¹⁵⁰ MAGIC. Available at: <https://magic.defra.gov.uk/MagicMap.html>

Figure 7.4 Source Protection Zones



Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agwRnXietboAGA> (Accessed 31st October 2025)

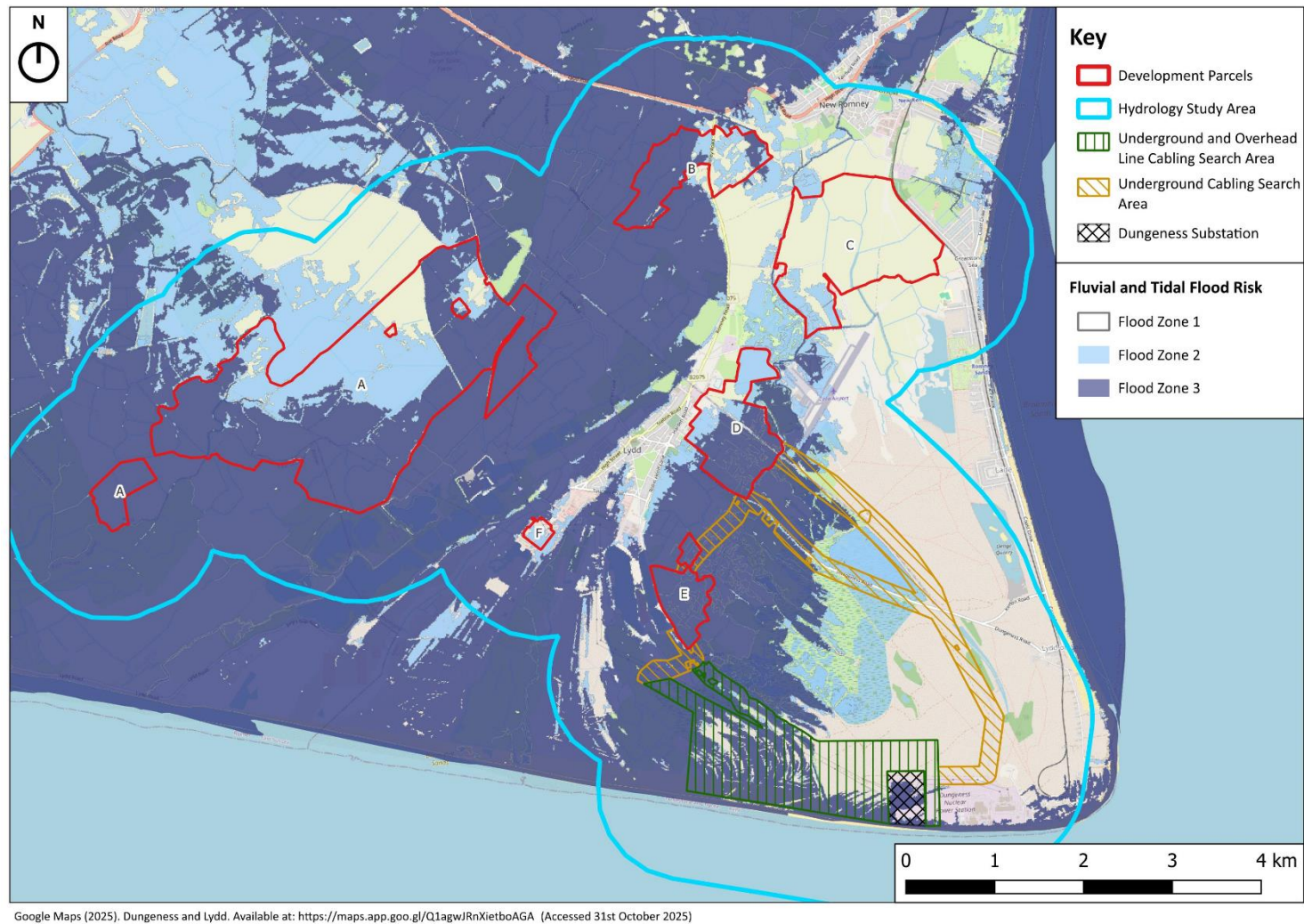
- 7.6.20. While Site boundary is located outside of the SPZs, it is noted that the cable route options have the potential to cross these SPZs in order to connect to the Dungeness National Grid Substation to the southeast.
- 7.6.21. Review of LandIS⁵⁶ Soilscales indicates that across Dungeness and Lydd, two general soil types are present including Sand Dune Soils and Loamy/Clayey Soils of Coastal flats. Soils are shown to be freely draining and naturally wet.
- 7.6.22. The locations of any private water abstractions (licensed or unlicensed) have not been reviewed at this stage. Private water abstractions within the Study Area will be assessed as part of the ES, if this receptor is scoped into the assessment once baseline information is received.

Flood Risk

Fluvial and Tidal Flood Risk

- 7.6.23. The EA's Flood Map for Planning (**Figure 7.5**) shows that large areas of Site boundary are located within Flood Zones 2 and 3 which indicates a medium to high probability of flooding from fluvial and tidal sources.

Figure 7.5 EA Flood Map for Planning



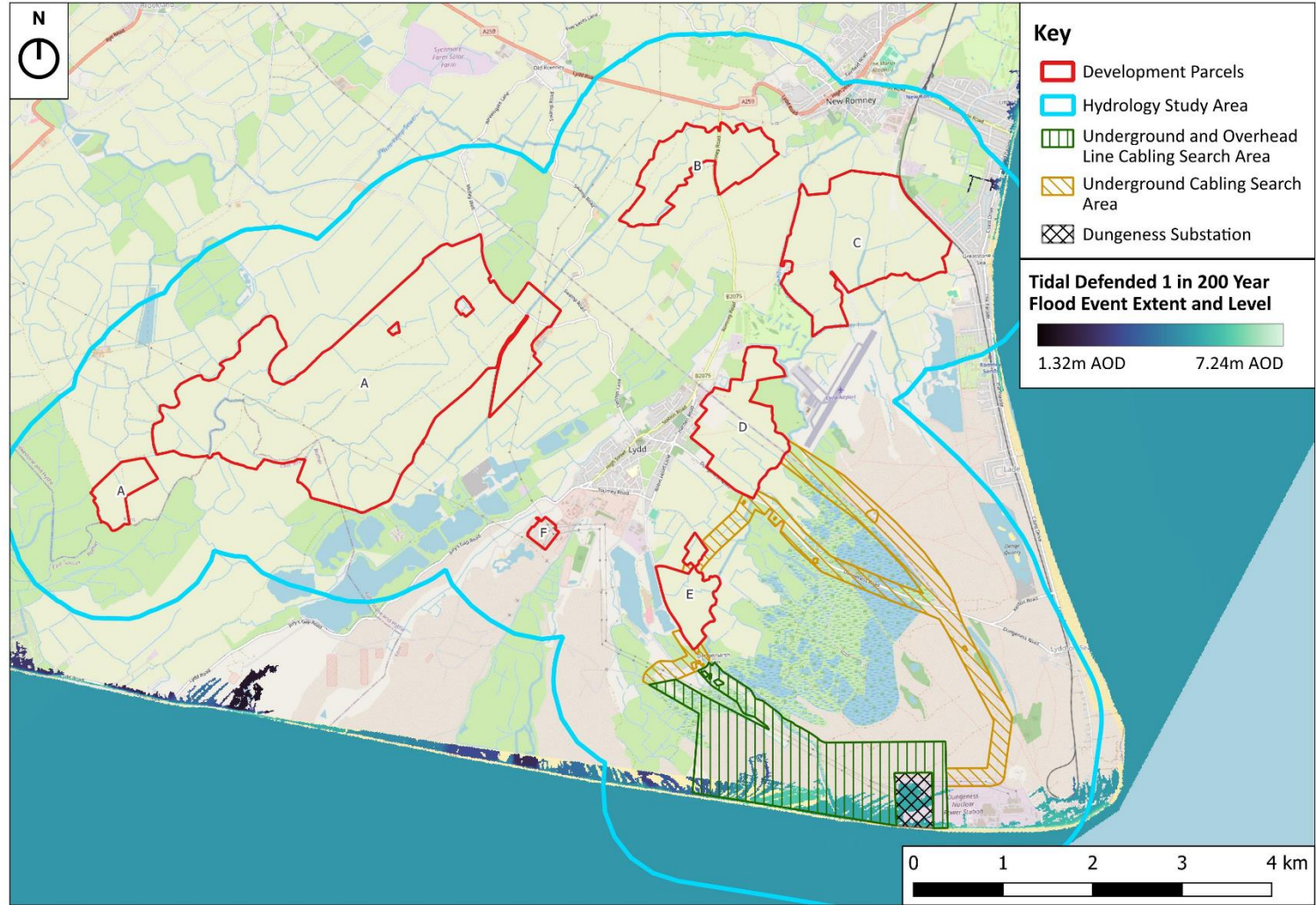
- 7.6.24. The majority of South Brooks C is located within Flood Zone 1 which indicates a low probability of flooding from fluvial and tidal sources. Areas of Flood Zone 2 are present within the south of this land parcel.
- 7.6.25. The majority of South Brooks A, B, D and F are located within Flood Zones 2 and 3. Some areas of Flood Zone 1 are present within these land parcels. The entirety of South Brooks E is located within Flood Zone 3.
- 7.6.26. Table 7.1 below shows the percentage proportions of Flood Zones within each land parcel. It is important to note that Flood Zone 2 encompasses all areas of Flood Zone 3. As such, the true extent of Flood Zone 2 for South Brooks A would therefore be $26.2 + 66.3 = 92.5\%$ of the entire land parcel.

Table 7.1 Flood Zone Extent Proportions

	Flood Zone 1	Flood Zone 2	Flood Zone 3
South Brooks A	7.5%	26.2%	66.3%
South Brooks B	17.1%	21.5%	61.4%
South Brooks C	88.4%	11.6%	0.0%
South Brooks D	11.4%	29.6%	59.0%
South Brooks E	0.0%	0.4%	99.6%
South Brooks F	40.0%	57.4%	2.6%

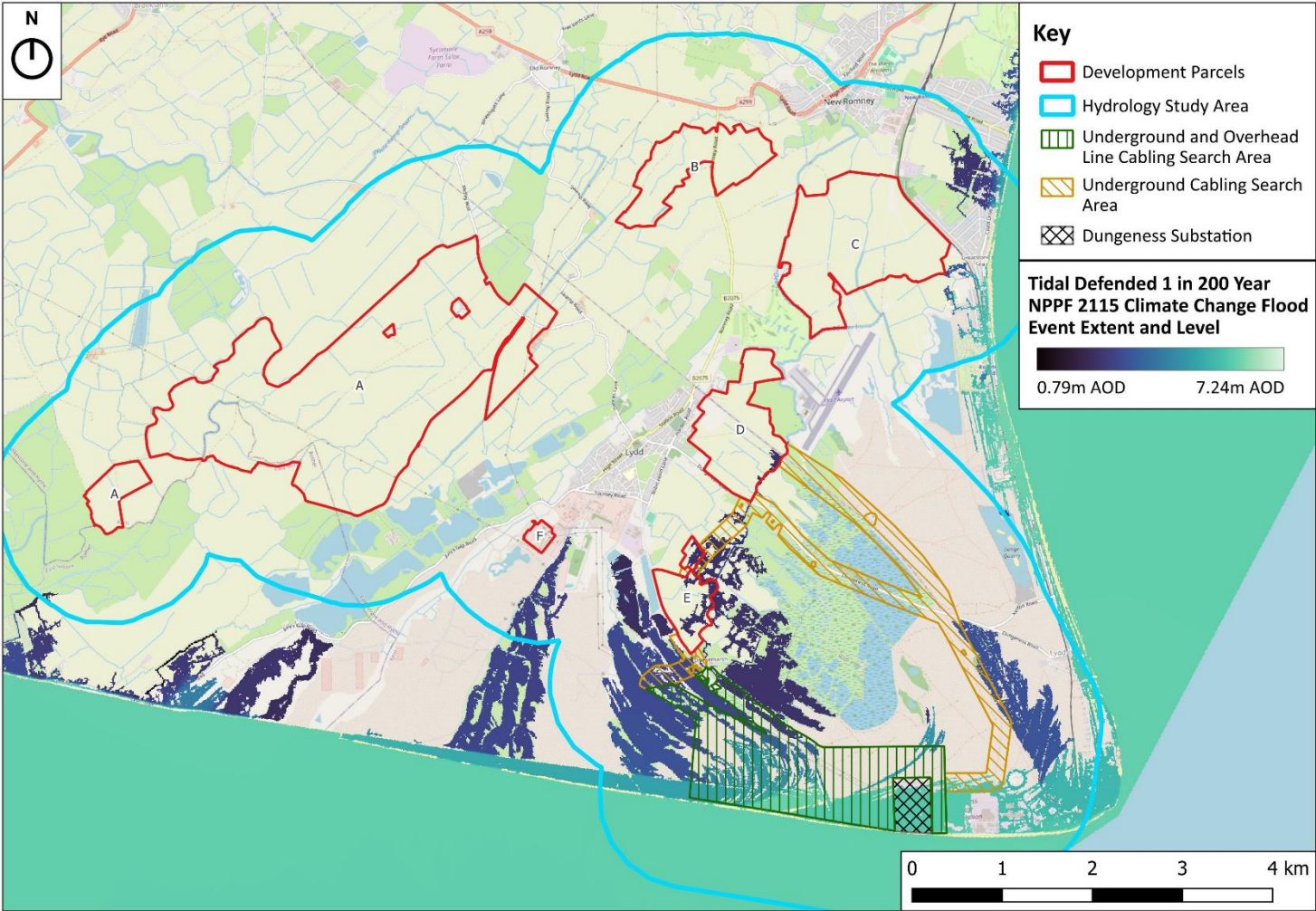
- 7.6.27. The EA has provided hydraulic modelling data in the form of the Romney Marshes Breach and Flood Forecasting (2020) model which assesses coastal flood risk posed to Romney Marshes (and Site boundary). The model does not contain any assessed fluvial events. Based on the modelling provided by the EA, it is assumed that the dominant mechanism of flooding in the Romney Marshes area is tidal and that the fluvial influence is minimal if not negligible. As such, there are no anticipated fluvial waterbodies within the Study Area. This is being confirmed through discussions with the EA.
- 7.6.28. The Dengemarsh Sewer, Southbrooks Sewer, and Jury's Gut Sewer are tidally influenced. Although, there is a possibility that there is some fluvial influence within Site boundary due to incident rainfall, but as detailed in 7.7.27 the dominant source is likely to be tidal.
- 7.6.29. Based on the EA's Romney Marshes Breach and Flood Forecasting Model, the entire Site is shown to be located outside of the 1 in 200 year return period event defended scenario. The majority of Site boundary is also shown to be outside of the flood extent during a defended scenario for the 1 in 200 year return period event with an NPPF allowance for climate change up to the year 2115 (**Figure 7.6** and **7.7** respectively).

Figure 7.6 Tidal Defended 1 in 200 Year Flood Event Extent and Level



Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agwJnXietboAGA> (Accessed 31st October 2025)

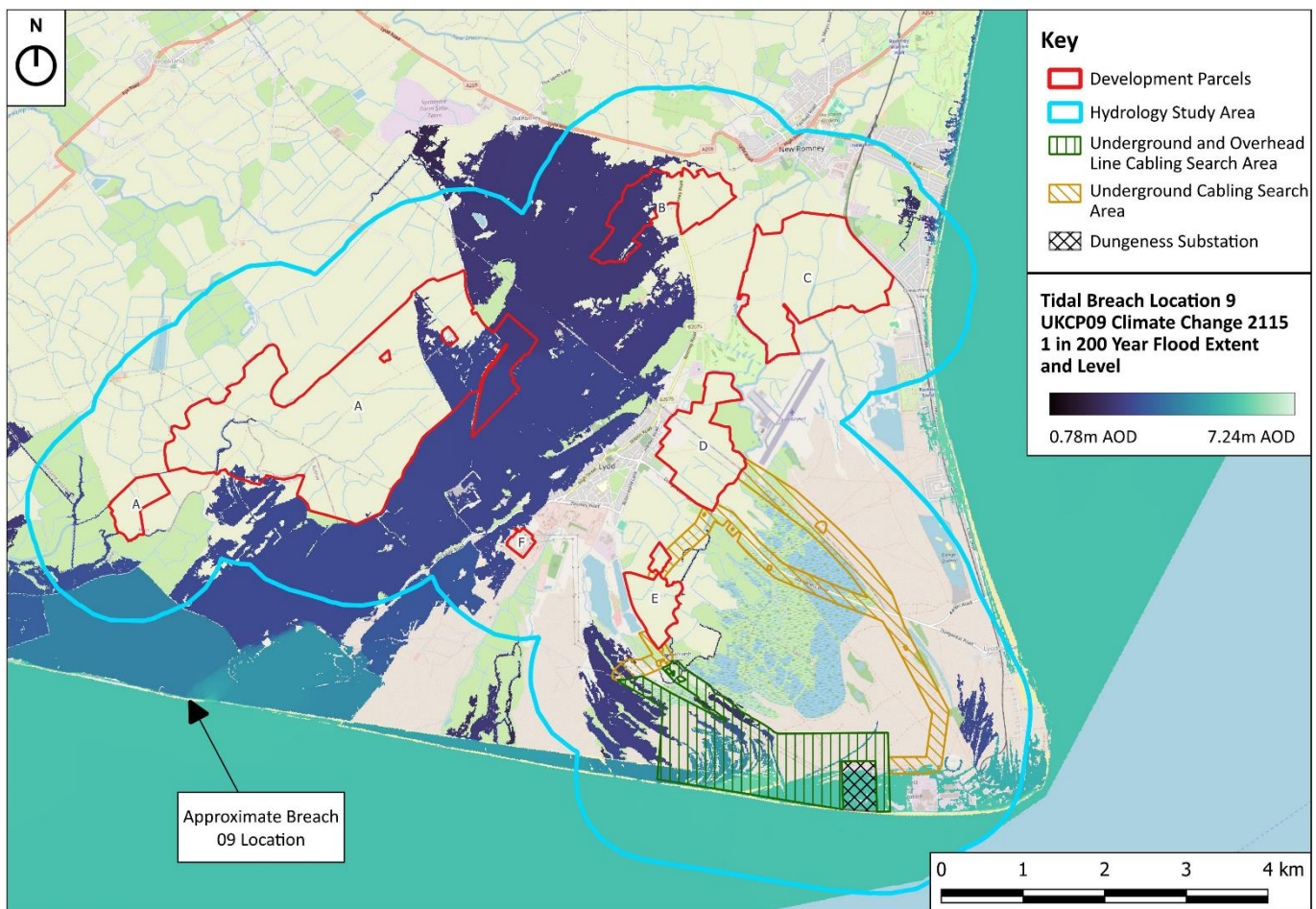
Figure 7.7 Tidal Defended 1 in 200 Year NPPF 2115 Climate Change Flood Event Extent and Level



Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agw/RnXietboAGA> (Accessed 31st October 2025)

7.6.30. Based on the EA modelling, some areas of Site boundary are shown to be at residual risk of flooding in a breach scenario for the 1 in 200 year plus climate change event. This is particularly the case for breach location 9 at Jury's Gap, which affects the Jury's Gut main river and results in flooding to areas of South Brooks A and B, as illustrated in **Figure 7.8**. It is worth noting that the breach modelling provided by the EA to date does not include NPPF climate change allowances but does include UKCP09 allowances.

Figure 7.8 Tidal Breach Location 9 UKCP09 Climate Change 2115 1 in 200 Year Flood Extent and Level

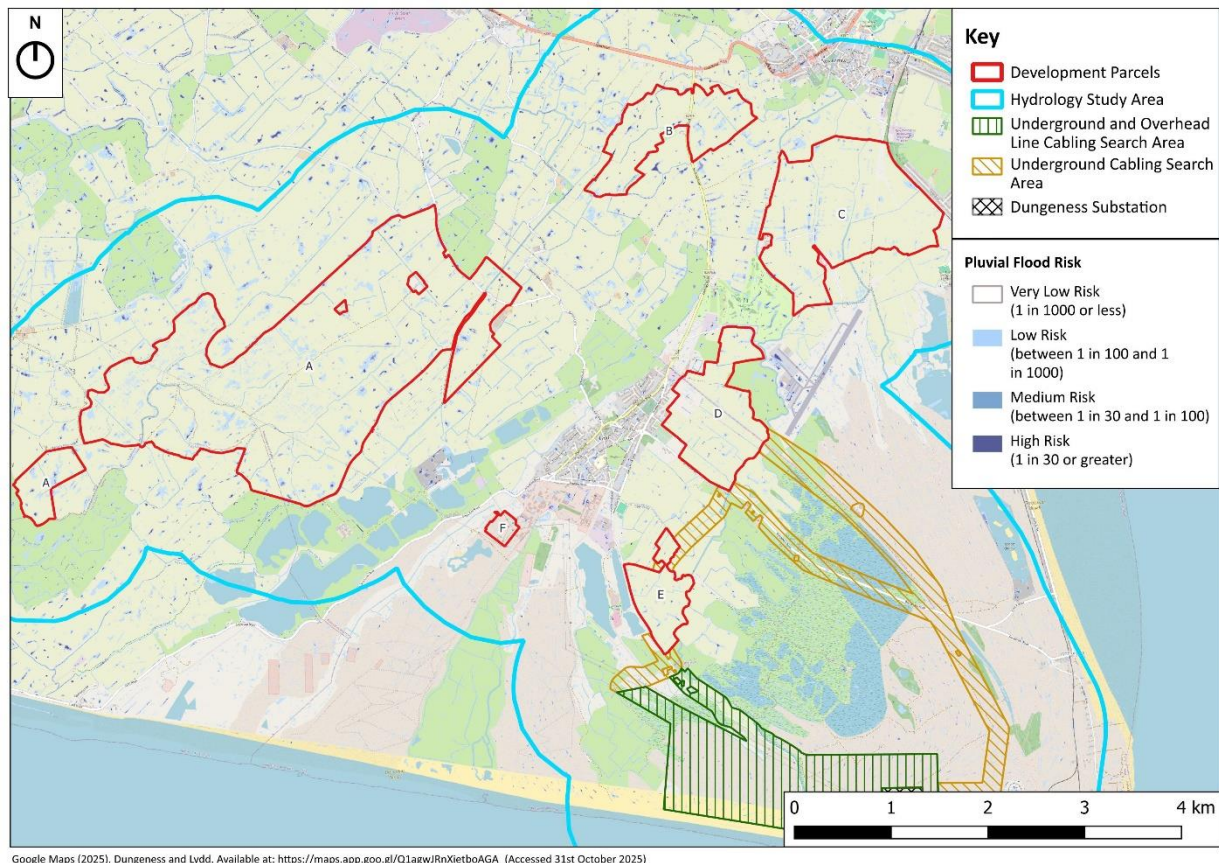


Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agwJrnXietboAGA> (Accessed 31st October 2025)

Pluvial Flood Risk

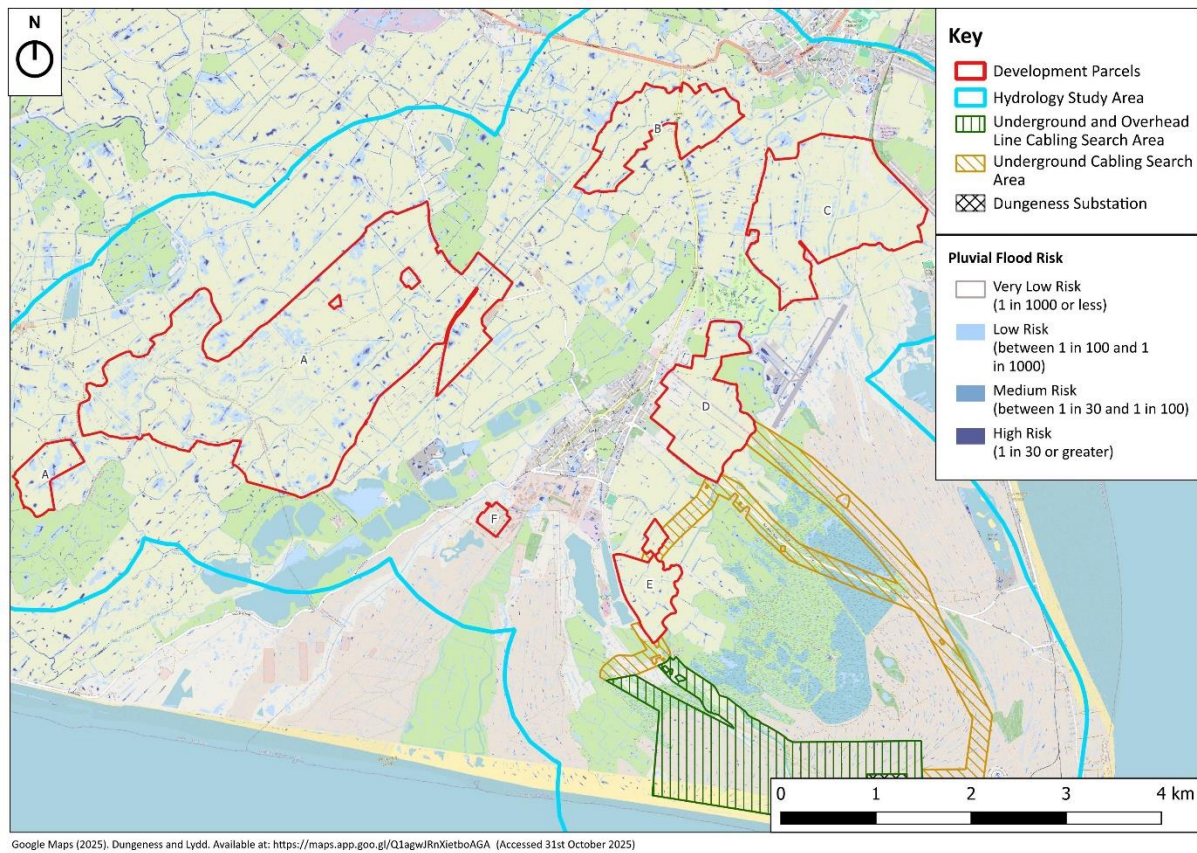
7.6.31. The EA's present day surface water mapping (**Figure 7.9**) shows that the majority of Site boundary is located within an area of very low risk of flooding from surface water. While small areas of high to low surface water flood risk are present across the land parcels, these areas are generally shown as localised ponding rather than surface water flow routes.

Figure 7.9 Present Day Surface Water Mapping



7.6.32. The EA's climate change surface water mapping (**Figure 7.10**) also shows that Site boundary remains largely at a very low risk of flooding from surface water in the future 2040 to 2060 scenario. As with the present day mapping, the climate change mapping also shows that there are no major surface water flow routes across the land parcels.

Figure 7.10 Climate Change Surface Water Flooding

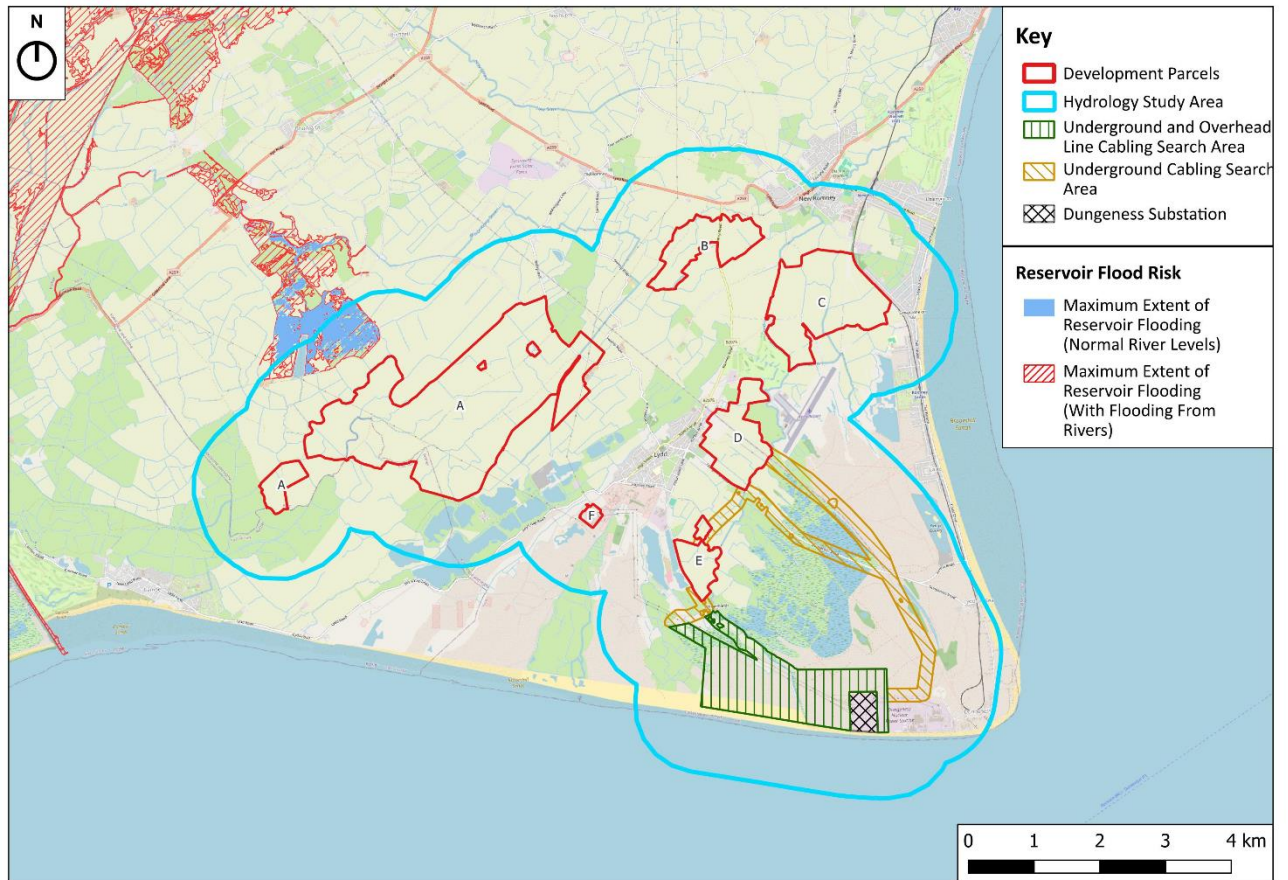


7.6.33. Surface water flood depths across Site boundary are generally shown to be below 200mm for the present day and climate change scenarios.

Artificial Sources of Flood Risk

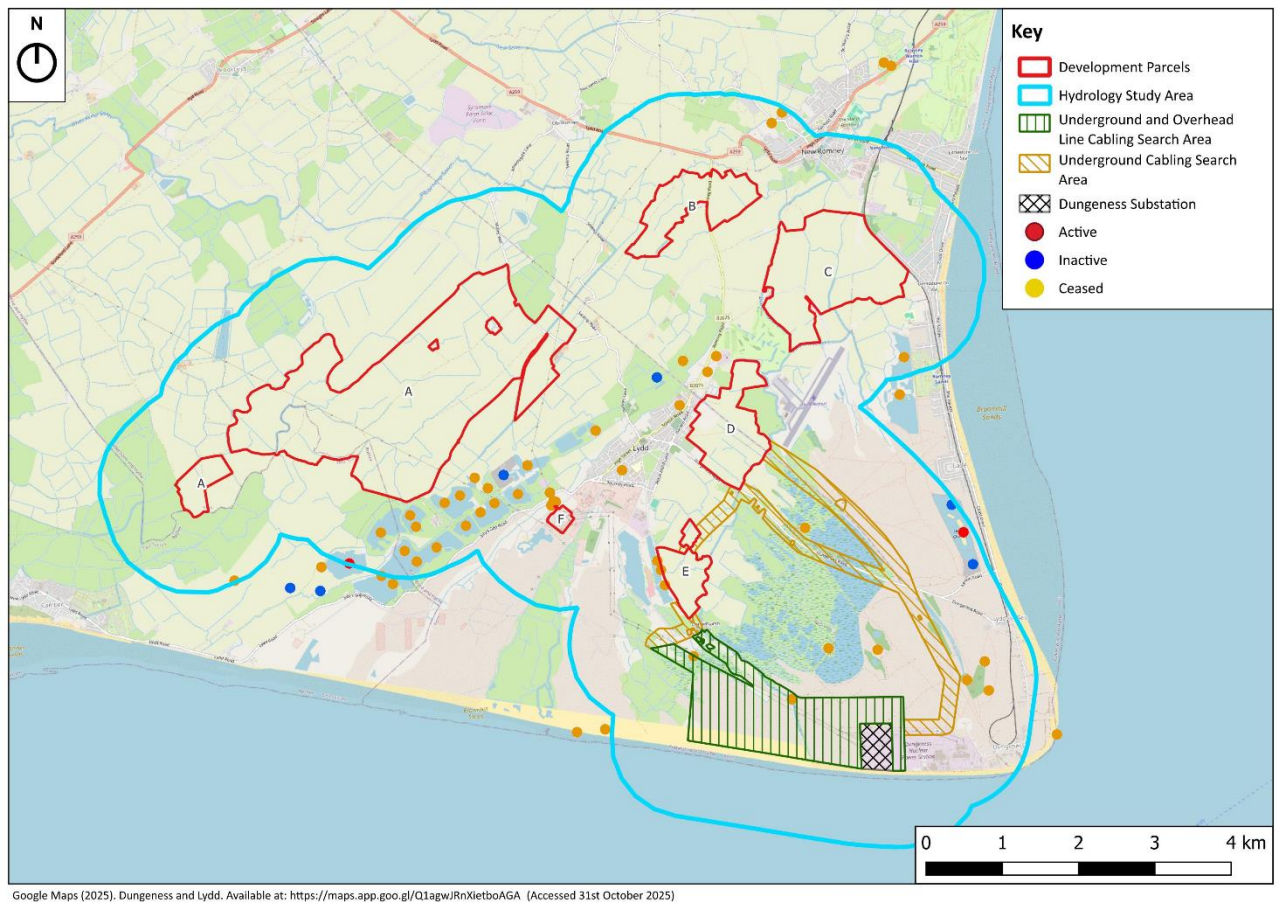
7.6.34. The EA's reservoir flood risk mapping (**Figure 7.11**) shows that the entire Site is located outside of the reservoir flood risk extent. There also are a number of water infilled quarries within the study area which will be considered as part of the assessment.

Figure 7.11 Reservoir Flood Risk



7.6.35. **Figure 7.12** shows the mine and quarry locations in the Romney Marshes area. The water infilled quarries shown to be located within the Study Area will be assessed. These water infilled quarries are shown to be Active, Ceased or Inactive.

Figure 7.12 Mine and Quarry Locations



- 7.6.36. In relation to quarries, Active is defined as a site which is actively extracting or handling (in the case of wharf/rail areas) a mineral; Ceased is defined as a site which has ceased to extract minerals; and Inactive is defined as a site which is not currently extracting minerals but still has valid planning permission to continue activities in the future.

Groundwater Flood Risk

- 7.6.37. The Shepway SFRA indicates that the majority of the district lies within a low-risk area. However, it is noted that the high-level mapping does not consider more localised causes of groundwater flooding such as low-lying land which is drained by man-made watercourses. Site boundary is dominated by low-lying land and consists of marine alluviums and beach sands which typically have the potential to convey groundwater. Combinations of shallow groundwater and permeable geology and soils increase the risk of groundwater levels rising and causing flooding at the ground surface. At this stage, depth to groundwater is unconfirmed as outlined within **Chapter 18 – Land and Groundwater** paragraph 18.5.16.
- 7.6.38. There is no conclusive evidence to say that Site boundary is at a high risk of flooding from groundwater sources. However, Site boundary is particularly low-

lying, consists of freely draining/naturally wet soils and has a mixture of tidal flat (clay/silt) and storm beach (gravel) superficial deposits atop sandstone/siltstone/mudstone bedrock geology. Therefore, there is potential for groundwater flooding to occur.

Sewer Flood Risk

- 7.6.39. Site boundary is largely located across agricultural fields within the Dungeness and Lydd area. As such, piped drainage infrastructure within Site boundary is anticipated to be limited and therefore the risk of flooding from surcharging sewers is considered to be low.

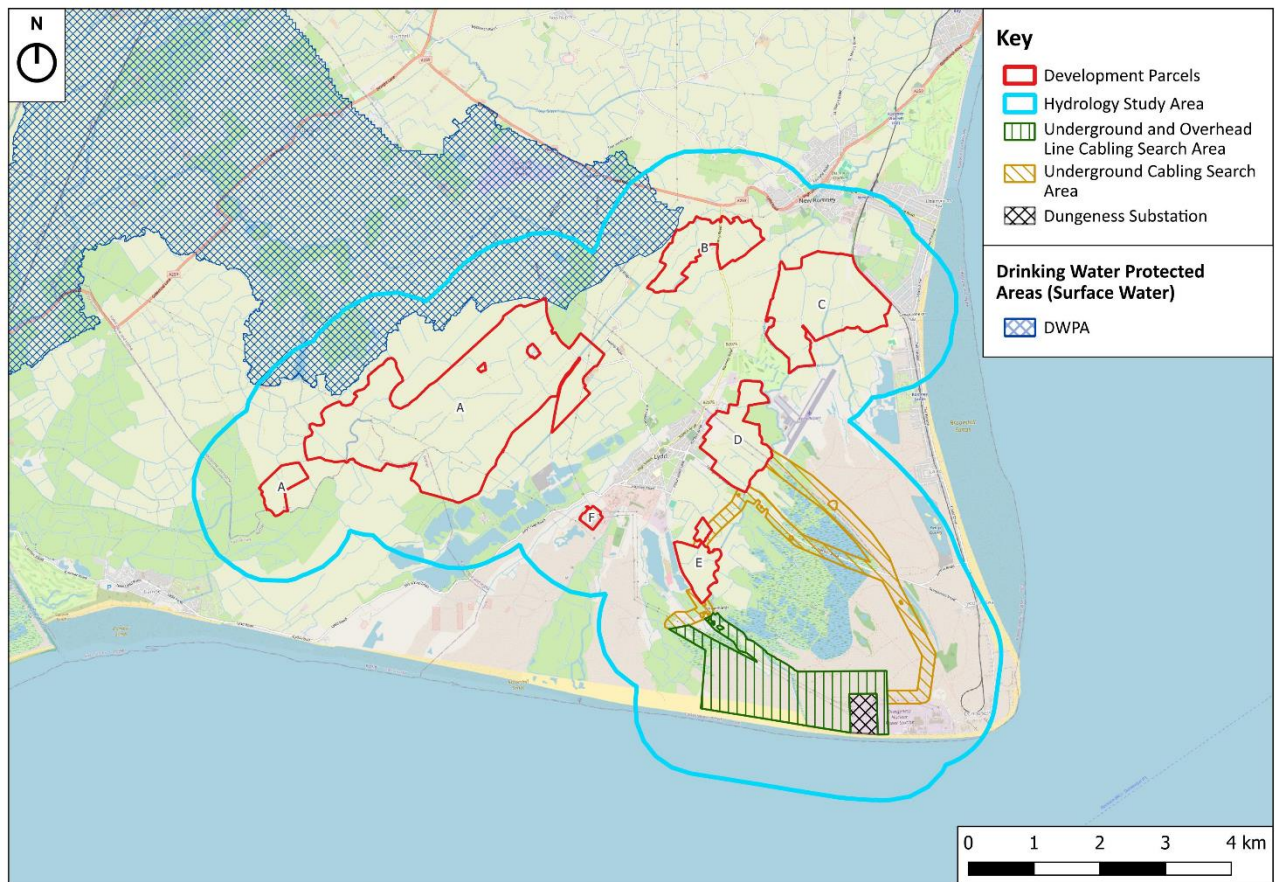
Water Supply and Sewerage Infrastructure

- 7.6.40. Records indicate that Affinity Water and Southern Water utilities are present within the Study Area. However, there is no indication as to whether these consist of sewerage or potable water infrastructure. It is understood that Affinity Water assets only consist of clean potable water supply.
- 7.6.41. The currently identified water utilities are located predominantly in the vicinity of South Brooks B, C, D, E and F. Southern Water assets are shown to run through and adjacent to South Brooks B, C, D and E. Affinity Water assets are shown to run through South Brooks B, C and D.

Water Protected Areas

- 7.6.42. Drinking Water Protection Areas (DWPAs) are areas where raw water is abstracted for human consumption – providing on average more than 10 cubic metres per day or serving more than 50 persons – or is intended for future use. Water sources for drinking supplies need to be protected under the WFD regulations to ensure they are not polluted and avoid/minimise the need for additional purification treatment.
- 7.6.43. A large DWPA (surface water) is located within the north of the Study Area (**Figure 7.13**). A significantly small portion of this zone crosses with the northern tip of South Brooks A. No other areas of Site boundary cross into the DWPA.

Figure 7.13 Drinking Water Protected Areas



Google Maps (2025). Dungeness and Lydd. Available at: <https://maps.app.goo.gl/Q1agwIRnXietboAGA> (Accessed 31st October 2025)

7.7. Important Receptors Identified

7.7.1. Following baseline reviews, important receptors have been identified for Site boundary as detailed below:

- Users of both the construction site (i.e. ground workers during construction and decommissioning) and of the completed development (operational maintenance staff) in relation to flood risk from all sources;
- Areas within the identified Study Area in relation to flood risk from all sources;
- Existing named watercourses within the Study Area – Dengemarsh Sewer, Jury's Gut Sewer, Southbrooks Sewer – and other unnamed watercourses within the Study Area with respect to associated existing water level management infrastructure, flood defences, surface water discharge rates, groundwater sources, DWPA (surface water) volume, and quality of runoff;
- Surrounding public water mains and sewers with regards to capacity/supply; and
- All future renewable energy generation infrastructure located within Site boundary.

7.8. Environmental Measures

- 7.8.1. Consideration will be given to opportunities to introduce environmental measures that will help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with paragraph 7 of Schedule 4 to the EIA Regulations, the ES will be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant adverse effects. Specific environmental measures relevant to Hydrology will be identified and will be considered as part of the assessments i.e. the assessments of likely significant effects will be undertaken with the inclusion of the environmental measures, as these measures will form part of the Proposed Development. The types of environmental measures that will be considered in preparing the ES are outlined in Tables 7.2 and 7.3 .
- 7.8.2. A Flood Risk Assessment (FRA) and outline Drainage Strategy will contain hydrology and hydrogeology specific embedded environmental mitigation measures which will be considered in the technical assessments for the DCO application and will be used to inform the ES Chapter.

Construction

- 7.8.3. There are a number of good practice techniques that will be employed during construction of the Proposed Development. The guidance and good practice literature will be used to further develop these methods in an outline Construction Environmental Management Plan (oCEMP) which would be submitted with the DCO application.
- 7.8.4. A range of environmental measures would be adopted, designed to avoid, minimise and mitigate for the effects during the construction phase. Table 7.2 provides a summary of key measures and mechanisms by which these would be delivered.

Table 7.2 Summary of types of environmental measures that will be considered for managing construction effects

Aspect/Features	Outline of environmental feature
Offsets and crossings	Infrastructure will be designed to minimise the number of watercourse crossings and encroachments. Suitable offsets will be provided from the top of bank of all watercourses to all construction activities to maintain ecological barriers and to ensure that access for maintenance is provided. Material stockpiles and construction storage will be located outside of the appropriate flood risk extents (likely outside of the design flood risk extents). Where possible, environmental capture measures (mitigation measures) will be employed to mitigate for effects.

Temporary drainage measures	Temporary drainage measures will be employed to ensure the existing drainage regime and surface water flows are maintained during construction and that the rate and quality of surface water runoff is managed. Temporary foul drainage measures would be employed to ensure foul drainage is contained and managed during construction.
Water Supply	The construction works will be designed to reduce onsite water demand so far as possible through the inclusion of prefabricated components that are constructed offsite (such as the panels and supports) and require limited construction activity during installation. Rainwater harvesting will be utilised wherever possible and water efficiency measures will be implemented to limit the use of water where required. Furthermore, water is to be sourced from non-potable sources or private supplies wherever possible, to reduce the pressure on demand from the water company. However, the feasibility of this is to be confirmed at detailed design stage. Discussions will be held with the water company to determine any capacity concerns.
Pollution prevention	Pollution prevention measures will be employed in accordance with good practice guidelines and included when storing and handling polluting substances, to prevent oil and chemical spills. Pollution prevention measures would also be employed to ensure water quality of any discharged surface water is maintained for the duration of the construction period.
Flood Risk	Flood risk to users of the construction site and off-Site areas would be managed through the delivery of the oCEMP, ensuring users are following flood evacuation and management plans as included within the oCEMP. This would include a consideration of off-site flood risk, setting out how risk is managed accordingly.

Operation and Maintenance

- 7.8.5. A range of environmental measures would be adopted, designed to avoid, minimise and mitigate for the effects during the operation and maintenance phase. Table 7.3 provides a summary of key measures and mechanisms by which these would be delivered.
- 7.8.6. There are a number of good practice techniques that will be employed during construction of the Proposed Development. The guidance and good practice literature will be used to further develop these methods in an outline Operational

Environmental Management Plan (oOEMP) which would be submitted with the DCO application.

Table 7.3 Summary of environmental measures proposed during operation

Aspect/Features	Outline of environmental feature
Surface water runoff and foul drainage management	Surface water runoff from new impermeable surfaced areas (such as the BESS Compounds) will be managed through the use of Sustainable Drainage Systems (SuDS) to ensure that there is no increase in flood risk elsewhere, and to ensure that the potential for pollutants is appropriately controlled prior to discharge. The Surface Water Drainage Strategy will include measures to ensure sufficient fire water and containment procedures are provided for emergency purposes should a fire occur. The Surface Water Drainage Strategy will include SuDS that are commensurate with the scale and nature of the scheme and designed in in line with national and local planning policy and guidance. There is limited potential for foul flows to be generated on Site. At this stage, the preferred foul management strategy would comprise septic tank and package treatment plant with subsequent discharge to a watercourse. Suitability of this method would be confirmed through consultation with the EA and RMIDB. Consultation would be undertaken with the local sewerage provider only if alternative options for foul water management are not viable.
Offsets	Development will be suitably offset from watercourses to allow sufficient access for maintenance. The watercourse offsets will be discussed and agreed with the EA, LLFA, or RMIDB as relevant. The largest offset will be taken to encompass offset requirements from others.
Water Supply	Water supply measures will be employed during the operation period to ensure that the users of Site boundary have sufficient potable water for amenity and operational activity purposes. The operational works will be designed to reduce onsite water demand so far as possible through the use of rainwater harvesting (where possible) and water efficiency measures to limit the use of water where required. Water is to be sourced from non-potable sources or private supplies wherever possible, to reduce the pressure on demand

from the water company. However, the feasibility of this is to be confirmed at detailed design stage.

Discussions will be held with the water company to determine any capacity concerns.

Flood Risk

Flood risk to users of Site boundary and off Site areas would be managed through the delivery of the oOEMP and the provision of the FRA and outline Drainage Strategy, ensuring users are following flood evacuation and management plans.

Embedded environmental design measures will be included within the FRA and outline Drainage strategy (such as panel raising above flood levels, where required) to ensure there is a negligible impact on flood risk as a minimum.

A sequential approach will be taken to ensure that sensitive infrastructure (such as BESS Compounds) is located away from areas of flooding, maintaining their operational capacity and minimising their potential impact on floodplain storage.

Decommissioning

- 7.8.7. The potential effects during the decommissioning stage are expected to be no worse than those experienced during construction, and an outline Decommissioning Environmental Management Plan (oDEMP) would be employed during the decommissioning stage to ensure that the natural drainage regime is maintained and that any potential pollution of surface water runoff is managed. Furthermore, the oDEMP would ensure that decommissioning activities would not impede flow routes where possible to ensure that flood risk is not increased elsewhere. At an appropriate time in the future a detailed Decommissioning Environment Management Plan (DEMP) will be produced in accordance with the principles set out in the oDEMP to provide the actual management measures for decommissioning. It is anticipated that the environmental measures implemented for the decommissioning phase will be substantially similar to those proposed for the construction stage.

7.9. Scope of the Assessment

Consultation Undertaken to Date

- 7.9.1. An overview of current consultation which has been undertaken for Hydrology to date is provided in Table 7.4.

Table 7.4 Consultation Undertaken to Date

Date	Consultee	Summary

3 rd September 2025	Environment Agency (EA)	Initial meeting held with the Environment Agency to provide an introduction to the Proposed Development. The EA will continue to be consulted as the design evolves, and in particular, to agree the scope of assessment in relation to the flood risk assessment, foul drainage strategy and WFD Assessment for the DCO application.
To be Undertaken	Natural England (NE)	To discuss pollution prevention, WFD Assessments, surface water runoff discharge and potential effects to statutory Sites within and in the vicinity of Site boundary.
To be Undertaken	RMIDB	To discuss elements of the surface water drainage strategy for the DCO application and the required offsets and flood risk management measures for RMIDB watercourses.
To be Undertaken	Kent County Council (KCC, LLFA)	To discuss the surface water and foul drainage strategy for the DCO application.
To be Undertaken, as applicable	East Sussex County Council (ESCC, LLFA)	To discuss the surface water and foul drainage strategy for the DCO application.
To be Undertaken	Water Company	Discussions with the local water provider to determine the demands of the Proposed Development and construction activities on water supply where appropriate. Water supply will primarily be sourced from non-potable and private supplies.
To be Undertaken	Sewerage Provider	Discussions with the local sewerage provider to determine capacity and upgrades required for the existing sewerage network and local treatment works in relation to the effects of the Proposed Development and construction activities on foul drainage.

Effects Scoped Out from Detailed Assessment

7.9.2. Table 7.5 presents the Hydrology matters that are unlikely to give rise to significant adverse effects and, therefore, are proposed to be scoped out from detailed assessment.

Table 7.5 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out

Fluvial, Pluvial and
Reservoir Flood Risk
(construction, operation
and decommissioning)

Site boundary is located by the coast and is beyond 1km from any waterbodies which are anticipated to be fluvially influenced or identified reservoirs. The majority of Site boundary is located within an area at a very low risk of flooding from surface water.

Consultation with the EA and RMIDB will continue to evolve to agree the scope of assessment for flood risk and any requirements for hydraulic modelling assessments (i.e., fluvial and pluvial modelling).

At this stage, impacts as a result of flood risk or changes to flood risk outside the Study Area are considered to be negligible, where areas outside of the Study Area become specifically identified through consultation with the RMIDB and EA, these will be included as part of the detailed assessments.

Changes to flood risk
associated with cabling
(operation)

Whilst details on the cabling including route and design are still evolving, there is potential for the proposed cable routing to cross a number of flood risk areas and watercourses. If buried, they are not anticipated to impact flood risk. Due to the shallow nature of the excavations associated with underground cabling, it is anticipated that groundwater flows, if any, surrounding cable route locations would flow as existing or around and therefore remain unaffected.

In the event that the proposed cabling is overhead, all potential flood risk at Site boundary would remain unaffected and there would be no impact on hydrology as a result of the cables themselves, as they will be elevated above the ground. However, there is a possibility that flood risk could be affected by pylons if located within flood risk areas and the potential impact of these will be reviewed if overhead cabling routes are to be included.

Effects on licensed and
private water supplies
located over 1km from Site
boundary and not
hydrologically connected;
and over 250m from
infrastructure (excavations
> 1m depth) associated

Guidance¹⁵¹ on private water supplies indicates that no further assessment is required should construction activities >1m in depth be greater than 250m away from the groundwater abstraction source and therefore any effects are considered unlikely to be significant.

¹⁵¹ Guidance on Assessing the Impacts of Development on Groundwater Abstractions, August 2024, SEPA

with Site boundary (during construction, operation and decommissioning)

Erosion and Sedimentation (during operation)	Operation of the Proposed Development would have negligible impact on sediment loads and therefore any effects are considered unlikely to be significant. The adopted surface water drainage strategy would ensure that surface water runoff is managed in line with national and local planning policy and guidance to ensure water quality and quantity is managed appropriately and subsequently does not cause increased sedimentation and erosion of the surrounding ground.

Likely Significant Effects Scoped Into the Detailed Assessment

- 7.9.3. Table 7.6 presents the Hydrology matters that are likely to give rise to significant adverse effects and, therefore, are proposed to be scoped into the detailed assessment.

Table 7.6 Likely Significant Effects Scoped In from the Detailed Assessment

Potential Effect	Rationale to be Scoped In
Flood Risk Effects on Users of Site boundary and solar farm infrastructure (construction, operation, decommissioning)	The potential for the effects of flooding from tidal, surface water and groundwater sources to affect users of Site boundary and infrastructure.
Changes in Flood Risk to areas Off Site (construction, operation, decommissioning)	The potential for the changes in flood risk from tidal, surface water and groundwater sources to affect areas off-Site during all phases of the Proposed Development. As detailed within the study area section, off Site areas are deemed to be within a 1km buffer from the red line boundary. Changes in flood risk to areas beyond the 1km buffer are deemed to have negligible impact.
Effects of changes in quality and quantity of surface water runoff to surrounding watercourses and/or waterbodies (construction, operation, decommissioning)	The potential for the Proposed Development to have effects on the quality and quantity of surface water i.e. as a result of increased sediment loads or flow pathway alterations.
Public Water Supply (construction, operation, decommissioning)	The potential for the increased demand for potable water as a result of the Proposed Development during all phases of the development. Effect on the capacity of local supplies and on the local network infrastructure.

Wastewater Infrastructure and Impact on Capacity (construction, operation, decommissioning)

The potential effects on the local sewerage treatment works capacity as a result of the Proposed Development due to increased foul flow rates.

7.10. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 7.10.1. In order to inform the assessment, a detailed review of the baseline conditions will be undertaken to ensure that all aspects of Site boundary and important receptors are understood, and the effects can be assessed accurately. As well as baseline research, further and continued consultation will be undertaken with the consultees noted in Table 7.4.

Cumulative Assessments

- 7.10.2. The assessment methodology for cumulative and in-combination assessments has been detailed within Chapter 5 General Methodology for EIA Cumulative Effects Assessment.

Surveys To Inform Baseline

- 7.10.3. A walkover of Site boundary will be carried out, where appropriate, to assess the existing baseline conditions. Furthermore, the assessments will be informed by a topographic survey (undertaken by a survey contractor).
- 7.10.4. The Applicant will undertake groundwater monitoring which will inform groundwater conditions at Site boundary. This will further inform the assessment of groundwater flood risk at Site boundary.

Assessment of Effects

- 7.10.5. The assessment will be undertaken using standard EIA methodology with the sensitivity of the receptor, magnitude of the potential impact, and likelihood of the effect being determined, before using the specified matrix to determine the significance of effect on specific receptors.

Determining Receptor Sensitivity

- 7.10.6. Sensitivity criteria are based on both the ability of a receptor to accommodate the anticipated impact of the likely changes, as well as the importance of the resource under consideration or designated value of the receptor (e.g. a designated area of international or national importance has a higher value and therefore higher sensitivity than other areas of lower status). Evaluation of sensitivity of hydrology requires a considerable degree of judgement, based on defined characteristics and values and professional experience.

7.10.7. The sensitivity criteria used in this assessment is presented in Table 7.7.

Table 7.7 Receptor Sensitivity Criteria

Sensitivity of Receptor	Definitions
Very High	- Groundwater classified under the WFD as 'good'. - Principal aquifer providing regionally important resources, i.e., Groundwater Protection Zone I. - Groundwater vulnerability High. - Flood Risk – Essential Infrastructure or Highly Vulnerable development in line with Annex 3 of the NPPF.
High	- Surface water classified under the WFD as 'good' or ecological potential of 'moderate'. - Principal aquifer providing regionally important resources, i.e., Groundwater Protection Zone II. - Groundwater vulnerability Medium-High. - Flood Risk – More Vulnerable development in line with Annex 3 of the NPPF. - Water supply networks with insufficient capacity (current or planned for) to serve the proposed development, where additional supply required by the development would lead to over abstraction and/or environmental degradation. - Foul drainage network or treatment works with insufficient capacity to receive flows from the development, where additional foul flows would lead to flooding and/or releases to the environment.
Medium	- Surface water classified under the WFD as 'moderate/poor/bad' or ecological potential of 'poor/bad'. - Aquifer providing water for agricultural or industrial use with limited connection to surface water Groundwater Source Protection Zone III. - Groundwater vulnerability Medium. - Flood Risk – Less Vulnerable development in line with Annex 3 of the NPPF.
Low	- Surface water without WFD classification. - Groundwater with unproductive strata. - Groundwater vulnerability Low. - Flood Risk – Water Compatible Development in line with Annex 3 of the NPPF. - Water supply networks with sufficient capacity (current or planned for) to serve the Proposed Development; therefore, not envisaged to result in over abstraction and/or environmental degradation. - Foul drainage network or treatment works with sufficient capacity (current or planned for) to receive flows from the

Proposed Development; therefore, not envisaged to result in flooding and/or releases to the environment.

Determining the Magnitude of Impact

7.10.8. Magnitude of impact or change is the potential effect in relation to the resource that has been quantified using the scale: Very High, High, Medium, or Low. It includes the consideration of timing, scale, size and duration of a potential impact. The magnitude of the impact is a measure of the degree that the potential effect could manifest on the receptors.

7.10.9. The magnitude of impact criteria is summarised in Table 7.8 below.

Table 7.8 Magnitude of Impact

Magnitude of Impact	Definitions
Very High Adverse	- Impact resulting in loss of feature or use. - Fundamental (long-term or permanent) changes to surface water, water supply, groundwater, and geology (in terms of quantity, quality, and morphology). - Reduction in waterbody WFD classification. - Increase in peak flood level of >100mm.
High Adverse	- Impact resulting in loss of part (<10%) of feature or use. - Substantial but non-fundamental and short to medium term changes to the surface water, water supply, groundwater, and geology (in terms of quantity, quality, and morphology). - Contribution to a reduction in waterbody WFD classification. - Flood Risk – increase in peak flood level (>50mm).
Medium Adverse	- Impact on feature or use. - Detectable but non-fundamental and temporary changes to the surface water, water supply, groundwater and geology (in terms of quantity, quality and morphology). - Flood Risk – increase in peak flood level (>50mm).
Low Adverse	- Impact but of insufficient magnitude to affect feature or use. - No perceptible changes to the surface water, water supply, groundwater and geology (in terms of quantity, quality, and morphology). - Flood Risk – negligible change in peak flood level (+/-10mm).
No Change	- No impact to feature or use. - No changes to the surface water, water supply, groundwater and geology (in terms of quantity, quality, and morphology). - Flood Risk – no change in flood storage or peak flood level (0mm).

Low Beneficial	• Minor reductions in existing surface water polluting discharges. • Reduction of groundwater hazards to existing structures, reduction in waterlogging. • Flood Risk – creation of flood storage or decrease in peak flood level (>10mm).
Medium Beneficial	• Contributions towards improvement in waterbody WFD classification. • Improvement in waterbody catchment abstraction management strategy (or equivalent). Support to significant improvements in damaged groundwater-dependant terrestrial ecosystems. • Flood Risk - creation of flood storage or decrease in peak flood level (>50mm).
High Beneficial	• Removal of existing polluting discharges (or likelihood of removing polluting discharges) to waterbodies and improvement in WFD classification. • Removal of polluting discharges (or likelihood of removing polluting discharges) to an aquifer or groundwater dependant terrestrial ecosystems and improvement in WFD classification. • Recharge of an aquifer. • Flood Risk – creation of flood storage or decrease in peak flood level (>100mm).

Significance Criteria

- 7.10.10. The predicted significance of the effect is determined through a standard method of assessment based on professional judgement while considering sensitivity and magnitude of change as detailed in Table 7.9.
- 7.10.11. The combination of sensitivity and magnitude of impact combine to provide a matrix categorisation of significance (Major, Moderate, Minor and Negligible), subject to professional judgement.
- 7.10.12. Major and Moderate effects are considered to be significant in the context of the EIA Regulations. Where the significance of effect is assessed as being moderate or above, additional site-specific mitigation will be required.

Table 7.9 Significance of Effect

Magnitude of Impact	Sensitivity of Receptor			
Effect Criteria	Very High	High	Medium	Low
Very High	Major	Major	Moderate	Moderate

High	Major	Moderate	Moderate	Minor
Medium	Moderate	Moderate	Minor	Minor
Low	Minor	Minor	Minor	Minor
No Change	*	*	Negligible	Negligible

* **The** significance of the impact will be determined based on the specifics of the impact and will be down to professional judgement and reasoning.

Nature of Effect

7.10.13. In addition to determining the significance of the effect, the assessment process also includes a qualitative description regarding the nature of the effect, as outlined in Table 7.10. These terms add information about how the effect would impact receptors. Unless otherwise stated, identified potential effects are considered to be adverse.

Table 7.10 Nature of Effect

Term	Nature of Effect Descriptor
Adverse	An effect which has the potential to decrease receptor value or status relative to baseline conditions.
Beneficial	An effect which has the potential to increase receptor value or status relative to baseline conditions.
Short-term	Effects that persist only for a short time, e.g., during the construction (or decommissioning) phase only; includes reversible effects.
Medium-term	Effects that may persist until additional mitigation measures have been implemented and become effective.
Long-term	Effects that persist for a much longer time, e.g., for the duration of the operational phase (essentially until the development ceases or is removed/reinstated); includes effects which are permanent (irreversible) or which may decline over longer timescales.
Temporary	A reversible effect where recovery is possible and for which effects would persist for only a short or medium term.
Frequent	Refers to a recurring effect that occurs repeatedly; in some cases, a lower level of impact may occur with sufficient frequency to reduce the ability of a receptor to recover effectively.

Technical Assessments

Flood Risk Assessment and Drainage Strategy

7.10.14. As part of the DCO application, a Flood Risk Assessment (FRA) and an accompanying outline Drainage Strategy will be prepared which will take account of the above baseline research, consultation and analysis.

- 7.10.15. The principles of the assessment would be agreed with the EA, RMIDB and LLFA. Flood risk and drainage constraints and opportunities will be incorporated into the masterplan which sets out the overall design principles and layout for the Proposed Development. The scope of the FRA and outline Drainage Strategy would include the following:
- Consideration of the likely significant effects of flooding to Site boundary and identification of any necessary embedded mitigation measures.
 - Consideration of the likely significant effects of flooding to areas off Site and identification of any necessary embedded mitigation measures.
 - Residual risks after implementation of any necessary mitigation measures, allowing for the future impacts of climate change.
 - Qualitative consideration of any effects on the flow of groundwater beneath Site boundary.
 - SuDS appropriate for inclusion within the Proposed Development.
- 7.10.16. An assessment of potable water supply to serve the Proposed Development and likely foul runoff volumes would also be provided.
- 7.10.17. The above research, consultation and FRA (including outline Drainage Strategy) will be used to determine and conclude the impacts that the potential effects would have on the receptors identified.

Water Framework Directive (WFD) Screening Assessment

- 7.10.18. A Water Framework Directive (WFD) Screening Assessment will be progressed in consultation with the EA and Natural England. This will form the initial stage of assessment of the potential impacts on water bodies and will determine whether further scoping and detailed impact assessment is required. This would be submitted alongside to the FRA and outline Drainage Strategy.

Assumptions, Limitations and Uncertainties

- 7.10.19. Consideration of Site topography has been based on EA's 1m LiDAR (2022).
- 7.10.20. The assessment will cover the hydrology aspects of Site boundary. No assessment of slope stability, geotechnical risk or contamination will be carried out as part of the assessment. These assessments will be included within **Chapter 18 Land and Groundwater**.
- 7.10.21. Floods are natural occurrences and the risk they pose are wide ranging. With regards to flood risk specifically, this study is primarily concerned with the risk to people and property from the nearby Coast, as well as flooding from other sources including surface water (pluvial) flooding, groundwater flooding, foul water and flooding from artificial sources.
- 7.10.22. Assessment of tidal flood risk to date has been based on the EA's Romney Marshes Breach and Flood Forecasting Model (2020), which we assume is

suitable for use based on the scale of development. Further consultation will be undertaken with the EA and RMIDB to ensure that appropriate datasets are utilised.

- 7.10.23. The Romney Marshes Breach and Flood Forecasting Model (2020) includes breach modelling climate change data based upon UKCP09 requirements. The use of this allowance rather than the NPPF allowance will be discussed with the EA.
- 7.10.24. The technical assessments and ES Chapter are to be informed through continued consultation with the relevant statutory consultees.

8. Agricultural Soils

8.1. Introduction

- 8.1.1. This Chapter of the Scoping Report presents the scope of the detailed environmental impact assessment for agricultural soils for the Proposed Development. Specifically, this section of the Scoping Report presents for this topic the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within Site boundary and surrounding area. It also sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and then concludes by outlining the method that would be used to undertake the detailed environmental assessment.

8.2. Review of Policy, Legislation, and Relevant Guidance

- 8.2.1. It should be noted that following the amendments to the NPPF in December 2024, there is no longer a need to consider food production in land use planning terms. An amendment has been made to the previous footnote 62 (now footnote 65) to remove the need to consider the availability of agricultural land for food production¹⁵². The applicable policy tests are therefore whether the use of agricultural land is justified and necessary, and whether the loss of Best and Most Valuable (BMV) land has been minimised through site selection, design layout and component locations.
- 8.2.2. Legislation, planning policy and guidance relating to agricultural soils, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- The Agricultural Land (Removal of Surface Soil) Act 1953¹⁵³; and
- Environment Act 2021¹⁵⁴.

National Planning Policy

¹⁵² The National Planning Policy Framework (NPPF) (2025). National Planning Policy Framework - GOV.UK (www.gov.uk)

¹⁵³ Agricultural Land (Removal of Surface Soil) Act 1953. available at: <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/16>

¹⁵⁴ Environment Act 2021. (c. 30). available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

- Overarching National Policy Statement for Energy (EN-1) (2023)¹⁵⁵, specifically Part 5 Section 5.11;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)¹⁵⁶, specifically sections 3.10.13 to 3.10.19, and section 3.10.136; and
- National Planning Policy Framework (NPPF) (December 2024, updated February 2025)¹⁵⁷.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)¹⁵⁸, specifically Policy CC6 ‘Solar Farms’;
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)¹⁵⁹; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)¹⁶⁰.
- Rother Local Plan Core Strategy (Adopted September 2014)¹⁶¹

National Guidance

- Natural England (2012) Agricultural Land Classification: Protecting the Best and Most Versatile Agricultural Land (TIN049)¹⁶²;
- Natural England (2017) Likelihood of Best and Most Versatile Agricultural Land¹⁶³;
- Natural England (2021). Guide to Assessing Development Proposals on Agricultural Land¹⁶⁴;

¹⁵⁵ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

¹⁵⁶ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

¹⁵⁷ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁵⁸ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

¹⁵⁹ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

¹⁶⁰ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

¹⁶¹ Rother District Council (2014), Rother Local Plan Core Strategy, available at: <https://rdcpbpublic.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

¹⁶² Available online: <https://publications.naturalengland.org.uk/publication/35012>

¹⁶³ Available online: <https://publications.naturalengland.org.uk/category/5208993007403008>

¹⁶⁴ Natural England (2021). Guide to Assessing Development Proposals on Agricultural Land. available at: <https://www.gov.uk/guidance/agricultural-land-assessments>

- Ministry of Agriculture, Fisheries and Food (1988) Agricultural Land Classification for England and Wales: Revised Criteria for Grading the Quality of Agricultural Land (ALC011)¹⁶⁵;
- Institute of Environmental Management and Assessment (IEMA) (2022) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment¹⁶⁶;
- Institute of Quarrying (2021) Good Practice Guide for Handling Soils in Mineral Workings¹⁶⁷;
- Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (2009)¹⁶⁸; and
- UK Parliament (2023) A Green Future: Our 25 Year Plan to Improve the Environment¹⁶⁹.

8.3. Existing Baseline Conditions

- 8.3.1. This section of the Scoping Chapter for agricultural soils sets out the known baseline conditions at this (scoping) stage of the Proposed Development. It is noted that further surveys and assessment is proposed to inform the technical assessment for the Environmental Statement (see details and scope of the further baseline data below under Section 8.6).

8.4. Study Area

- 8.4.1. The study area is confined to the Site boundary. Soil is highly localised and therefore it is not considered necessary or appropriate to extend the study area beyond the Site boundary.

Approach to the Collection of Baseline Data for Scoping

- 8.4.2. Baseline data has been collected using the following sources of data, as well as Proposed Development specific surveys:

¹⁶⁵ Ministry of Agriculture, Fisheries and Food (1988). Agricultural Land Classification of England and Wales: Revised Criteria for Grading the Quality of Agricultural Land. available at:

<https://assets.publishing.service.gov.uk/media/5a7de96d40f0b603e3f6ba1c/alc-guidelines-1988.pdf>

¹⁶⁶ Institute of Environmental Management and Assessment (IEMA) (2022). A New Perspective on Land and Soil in Environmental Impact Assessment. Available at: [cd-910-iema-land-and-soils-guidance.pdf](https://www.shropshire.gov.uk/cd-910-iema-land-and-soils-guidance.pdf) ([shropshire.gov.uk](https://www.shropshire.gov.uk))

¹⁶⁷ Institute of Quarrying (2021). Good Practice Guide for Handling Soils in Mineral Workings. available at: <https://www.quarrying.org/soils-guidance>

¹⁶⁸ Department for Environment, Food & Rural Affairs (2009). Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. available at: <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>

¹⁶⁹ UK Parliament (2023). A Green Future: Our 25 Year Plan to Improve the Environment. available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

- British Geological Survey maps (bedrock and superficial geology)¹⁷⁰; and
- Soil survey maps, available via Defra magic mapping application¹⁷¹.

Relevant Baseline Conditions for Scoping

Land Use

- 8.4.3. The Site comprises approximately 1,087ha of agricultural land, generally supporting arable crops. The remaining 7ha of land within the Site is in use as a military base as shown on **Figure 8.4 within Appendix E**. Previously Accepted Detailed Agricultural Land Classification Map.

Geology

- 8.4.4. The Site bedrock is made up of Hastings Beds which consists of ferruginous sandstones, shales and siltstones at depths typically greater than 30m below ground level. The superficial geology includes alluvium, blown sand, marine beach deposits, tidal deposits and storm gravel beach deposits. Details of the geology found across the Site boundary are displayed in **Figure 8.1 within Appendix E**.

Soil

- 8.4.5. Two soils have been mapped within the Site boundary on the Soil Survey of England and Wales, Soils of England and Wales, as illustrated in **Figure 8.2 within Appendix E**. The soil mapped belongs to the following soils types:
- Loamy and clayey soils of coastal flats with naturally high groundwater. These soils are mostly free draining with shallow groundwater and marginal ditches in most fields.
 - Sand dune soils, these soils are freely draining and granular and are often affected by groundwater.

Agricultural Land Quality

- 8.4.6. The ALC is based on the long-term physical limitations of land for agricultural use and factors affecting the grade can include climate and the soil characteristics. The combination of climate and soil factors determines the soil wetness and droughtiness. The current agricultural use, or intensity of use, does not affect the grading.
- 8.4.7. Detailed ALC surveys would be conducted within the Site boundary to inform the baseline conditions of this assessment. Detailed surveys are yet to be

¹⁷⁰ British Geological Survey. British Geological Survey Website. available online at: <https://www.bgs.ac.uk/>

¹⁷¹ Department for Environment, Food and Rural Affairs. Magic Mapping. available online at: <https://magic.defra.gov.uk/>

completed so the publicly available industry recognised Regional ALC Map has been used to inform the current baseline which is available through Magic Mapping Application¹⁷¹.

- 8.4.8. The Natural England Regional ALC Map shows the land within the Site boundary as Grades 1, 2, 3, 4 and non-agricultural and urban. Details are displayed in **Figure 8.3 within Appendix E**. Parcel A is predominately Provisional Grade 1 with patches of grade 2 particularly towards to east. Parcel B is Provisional Grade 2 and parcels C, D and E are mainly Provisional Grade 3 with small patches of Grade 4 as shown in **Figure 8.3 within Appendix E**.
- 8.4.9. No previous detailed publicly available ALC surveys have currently been conducted within the Site boundary.
- 8.4.10. Within 5km of the Site boundary, previous detailed ALC surveys have been conducted to land northeast, southwest and between the land parcels of the Proposed Development. This land has been mapped as Grade 2, Subgrades 3a, 3b and Grade 4. Details are displayed in **Figure 8.4 within Appendix E**.

Further Baseline Data

- 8.4.11. An ALC survey would be carried out within the Site boundary based on observations at intersects of a 100m grid, giving a density of at least one per hectare. Soils would be examined during the survey via a combination of auger borings and soil description pits to a maximum depth of 1.2m, where possible.
- 8.4.12. A topsoil sample from each soil description pit would be sent to NRM laboratories for particle size distribution analysis by the pipette methodology to confirm findings.
- 8.4.13. The droughtiness assessment would be undertaken following MAFF (1988) Revised Agricultural Classification Guidance¹⁷².
- 8.4.14. The ALC survey would be carried out in strict accordance with 'Agricultural Land Classification of England and Wales – revised guidelines and criteria for grading the quality of agricultural land', Defra 1988¹⁶⁵, and would inform the assessment presented in the ES.

Future Baseline

- 8.4.15. The baseline conditions for ALC Grades would remain unchanged from those described above. While there may be potential changes in relation to climate change, including greater rainfall intensity and frequency of droughts, that could

¹⁷² Natural England, formerly Ministry of Agricultural, Fisheries and Food (MAFF) (1988). Agricultural Land Classification for England and Wales: Revised criteria for grading the quality of agricultural land (ALC011). Available online: <https://publications.naturalengland.org.uk/publication/6257050620264448>

affect soil conditions, land grade, and farming practices, it is likely that these would become apparent over longer time frames.

- 8.4.16. There could potentially be future changes to land management practices and business approaches across the landowners/land managers irrespective of whether the Proposed Development goes ahead; these cannot be known or assessed currently as any future changes would be driven by a third party external to this Proposed Development.

Important Receptors Identified

- 8.4.17. The following receptors have been identified which would be assessed further:
- Soil ecosystems, referring to the soil's physical structure and make up; and
 - Agricultural land quality, referring to the soil's agricultural potential assessed through ALC.
 - It should be noted that agricultural farm business would be covered within **Chapter 16: Socioeconomics**.

8.5. Environmental Measures

- 8.5.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to agricultural soils would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). Environmental measures would be employed through all stages of the project to reduce the overall impacts on soil ecosystems and agricultural land quality, these measures would adhere to industry standard as set out in the Defra Construction code of practice for the sustainable use of soils¹⁶⁸.

Construction

- 8.5.2. Relevant embedded measures would be developed to avoid and minimise the impact on agricultural soils. An Outline Soil Management Plan (oSMP), which would be informed by ALC survey results obtained for the development of the ES, would form part of the Outline Construction Environmental Management Plan (oCEMP) that would be submitted in support of the DCO Application.
- 8.5.3. Access routes for the importation of construction materials, plant and equipment would be determined in advance to avoid inappropriate trafficking of soil. Measures contained within the Outline Construction Traffic Management Plan

(oCTMP) that would be submitted in support of the DCO Application would be adhered to, to ensure construction vehicle movements are monitored.

- 8.5.4. Soil would be stored within segregated stockpiles dependent on soil type and correctly managed including grassing and weeding regularly to reduce the risk of erosion and prevent the soil from becoming anaerobic.
- 8.5.5. Where vehicle movements are required over soils, these would be managed by the oSMP to prevent damage to soil structure such as through matting. The timing of works would be controlled to avoid periods when soil is more susceptible to damage, as would be detailed in and secured by the oSMP. Although construction of the Proposed Development would not adversely affect soils if the oSMP is followed, it is worth noting that although soil quality can be reduced due to works being undertaken in wet conditions, it is possible to return soils to their former condition after they have dried out, preventing medium or long-term effects.
- 8.5.6. Prior to construction commencing a detailed Soil Management Plan (dSMP) would be produced to build on the oSMP. The dSMP would include additional details to the oSMP including stockpile locations, heights and records, construction timing and soil plasticity.

Operation

- 8.5.7. The oSMP and Outline Operation Environmental Management Plan (oOEMP), both of which would be submitted in support of the DCO Application, would detail and secure measures to manage any potential impacts to the soil and agricultural land during the operation phase. As detailed above for the construction phase, the oSMP would identify areas that may be more susceptible to damage and advise on when soils are suitable for being handled or trafficked. The oSMP would also provide details on managing soil and maintaining the physical properties of the soil such as grassland management to prevent soil erosion and runoff.
- 8.5.8. There would be limited ground disturbance or trafficking over the soil during the operation phase in comparison to the construction phase. Maintenance would be subject to periodic visits, including replacement of damaged parts or cleaning and maintenance of the Solar PV modules. Established access tracks would be used during these activities and therefore any impacts would be minimised.
- 8.5.9. Wherever possible, the timing of works would be managed carefully to consider weather conditions, particularly heavy and persistent rain to minimise vehicles travelling across the Site boundary when soil conditions are wet. Movement of maintenance vehicles during the operation phase would be limited and would follow access tracks that have been established during the construction phase wherever possible.

- 8.5.10. It may be possible to potentially use the open spaces between the infrastructure and the land beneath the Solar PV modules for grazing during the operation phase, and therefore some agricultural use of the Site boundary may occur during the lifespan of the Proposed Development. If deemed possible, conditions suitable for grazing can be maintained and managed to help improve soil quality during operation.
- 8.5.11. As noted for the construction phase, there would continue to be storage of soil in managed, segregated stockpiles. The stockpiles would continue to be managed in accordance with the dSMP during the operation phase.

Decommissioning

- 8.5.12. The oSMP and Outline Decommissioning Environmental Plan (oDEMP), both of which would be submitted in support of the DCO Application, would detail and secure measures to manage any potential impacts to soil and agricultural land during the decommissioning phase. The oSMP would identify those areas within the Site boundary which may be more susceptible to damage and would advise on when soils are suitable for being handled or trafficked. The oSMP would also detail measures for soil management and follow the principles of best practice to maintain the physical properties of the soil, with the aim of restoring the land to its pre-construction condition at the end of the lifetime of the Proposed Development. Established access tracks would be used during the decommissioning phase and therefore impacts on soil due to vehicle movements would be limited.
- 8.5.13. Likewise, to the construction phase, where vehicle movements are required over soils for decommissioning activities, these would be managed by the oSMP to prevent damage to soil structure, as well as potential damage to field drains (and subsequent effects on drainage of agricultural land). This would control the timing of works and take into account soil saturation. Although the decommissioning phase would not adversely affect soils if the oSMP is followed, as above, it is worth noting that a reduction in soil quality can be reversed, preventing medium or long-term effects.

8.6. Scope of the Assessment

Consultation Undertaken to Date

- 8.6.1. No specific consultation has been undertaken to date for agricultural soils. However, Natural England would be consulted with at a later date of this project to provide feedback on the completed detailed ALC survey results, oSMP and EIA assessment. Further information on consultation completed to date for the Proposed Development is detailed in Section 5.5 of **Chapter 5: Approach to EIA**.

Effects Scoped Out from Detailed Assessment

- 8.6.2. There are no likely significant effects scoped out from detailed assessment.

Likely Significant Effects Scoped into the Detailed Assessment

Construction

- 8.6.3. Effects on soil ecosystems and agricultural land quality during the construction phase could include compaction and deterioration of soils and agricultural land. Construction activities, including trafficking of agricultural land by construction vehicles, formation of construction compounds, installation of the cable route and earthworks may lead to compaction and deterioration of soil and agricultural land.
- 8.6.4. Access tracks within the Site boundary are likely to be most susceptible to deterioration through erosion. Some soils are more susceptible to damage when handled during construction. Handling and moving of soil is expected to be avoided, where reasonably practicable.
- 8.6.5. Some soils are, however, more susceptible to structural damage from the use of machinery and vehicular activity, depending upon soil type, climate and wetness class. However, it should also be noted that the soils are currently predominantly in agricultural use and so are frequently driven over by farm machinery.
- 8.6.6. During the construction phase, the land designated for development within the PV array area, substations and cable route would be temporarily removed from agricultural use. As a result, there would be a temporary direct loss of arable land, leading to a decline in overall agricultural productivity and crop yields. This disruption may reduce the availability of locally grown produce and potentially impact the broader agricultural supply chain in the region due to the area of the Proposed Development.
- 8.6.7. The construction process would involve soil stripping, excavation, and temporary storage of topsoil and subsoil. These activities can lead to significant soil disturbance, including the loss of soil structure, compaction, and mixing of soil horizons. Improper handling and storage may degrade the quality of the soil, reducing its fertility and biological activity. Additionally, exposed soils are more vulnerable to erosion by wind and water, which can result in sediment runoff and potential contamination of nearby watercourses.

Operation

- 8.6.8. With respect to soils and agricultural land, there is anticipated to be limited ground disturbance or trafficking over the soils during operation, apart from periodic maintenance requirements, including replacement of damaged parts or cleaning and maintenance of the Solar PV modules.
- 8.6.9. The Proposed Development would lead to temporary impacts to soil ecosystems and agricultural land for the duration of the operation phase (assumed this could be up to 60 years).

- 8.6.10. However, by converting land currently used for arable farming to grassland (specifically the solar PV array areas), there is reduced soil disturbance which would help increase soil organic matter. By increasing soil carbon, the soil would have improved soil structure, soil ecosystems and water infiltration which would therefore increase overall soil health. There is expected to be a small area of land not returned to agricultural use following decommissioning due to habit creation and ecological enhancements. This area would be permanently lost from agricultural production therefore BMV land would be avoided wherever possible for this part of the development. Although the area would be permanently lost from agricultural production the soil ecosystems would continue remain undisturbed or improve due to an improved biodiversity and reduced agricultural pressure.

Decommissioning

- 8.6.11. With respect to soils and agricultural land, the decommissioning phase would involve the dismantling and removal of infrastructure. Following decommissioning, it is intended that this land would be returned to the landowner(s). By following good practice, the agricultural land would be returned to its previous quality prior to the commencement of the Proposed Development wherever practicable.
- 8.6.12. The trafficking of soil when conditions are unsuitable (e.g., when soils are wet) could damage soil structure, necessitating remedial activity to restore quality.

8.7. Proposed Approach to the ES

Assessment Methodology

- 8.7.1. The scope of this assessment has been established throughout the EIA process and design of the Proposed Development. Further information can be found in **Chapter 5: Approach to the EIA**.
- 8.7.2. The environmental assessment of soils and agriculture would use detailed ALC surveys carried out on the Site boundary to determine the baseline within the ES.
- 8.7.3. The ALC survey would be carried out in strict accordance with 'Agricultural Land Classification of England and Wales – revised guidelines and criteria for grading the quality of agricultural land', MAFF 19889. The detailed methodology would be provided as part of the full ALC chapter.
- 8.7.4. The assessment of the Proposed Development's effects on soils supporting agricultural land is considered in accordance with the Institute of Environmental Management and Assessment (IEMA) (now ISEP) Guide: A New Perspective on Land and Soil in Environmental Impact Assessment (2022)¹⁶⁶.

Table 8.1 Receptor sensitivity relating to agricultural land quality

Receptor sensitivity (in-situ soils)	Soil Resource and Soil Functions
Very High	Biomass production: ALC Grades 1 & 2. Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected features within a European site (e.g., SAC, SPA, Ramsar). Peat soils: Soils supporting a National Park, or Ancient Woodland. Soil carbon: Peat soils; Soils with potential for ecological/landscape restoration. Soil hydrology: Very important catchment pathway* for water flows and flood risk management. Archaeology, cultural heritage, community benefits and geodiversity: SAMs and adjacent areas; World Heritage and European designated sites; Soils with known archaeological interest; Soils supporting community/ recreational/ educational access to land covered by National Park designation. Source of materials: Important surface mineral reserves that would be sterilised (i.e., without future access).
High	Biomass production: ALC Grade 3a. Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected features within a UK designated site (e.g., UNESCO Geoparks, SSSI or AONB, Special Landscape Area, and Geological Conservation Review sites); Native Forest and woodland soils; Unaltered soils supporting semi-natural vegetation (including UKBAP Priority habitats or Section 6 habitats in Wales). Soil carbon: Organo-mineral soils (e.g. peaty soils). Soil hydrology: Important catchment pathway* for water flows and flood risk management. Archaeology, cultural heritage, community benefits and geodiversity: Soils with probable but as yet unproven (prior to being revealed by construction) archaeological interest; Historic parks and gardens; RIGS; Soils supporting community/ recreational/ educational access to Regionally Important Geologically Important Sites (RIGS) and Area of Outstanding Natural Beauty (AONBs). Source of materials: Surface mineral reserves that would be sterilised (i.e. without future access).
Medium	Biomass production: ALC Grade 3b. Ecological habitat, soil biodiversity and platform for landscape: Soils supporting protected or valued features within non-statutory designated sites (e.g. Local Nature Reserves (LNR), Local Geological Sites (LGSs), Sites of

Nature Conservation Importance (SNCIs), Special Landscape Areas; Non-Native Forest and woodland soils.
Soil carbon: Mineral soils.
Soil hydrology: Important minor catchment pathway* for water flows and flood risk management.
Archaeology, cultural heritage, community benefits and Geodiversity: Soils with possible but as yet unproven (prior to being revealed by construction) archaeological interest; Soils supporting community/ recreational/ educational access to land.
Source of materials: surface mineral reserves that would remain accessible for extraction.

Low

Biomass production: ALC Grades 4 & 5 or Urban soils.
Ecological habitat, soil biodiversity and platform for landscape: Soils supporting valued features within non-designated notable or priority habitats/landscapes.
Agricultural soils.
Soil carbon: Mineral soils.
Soil hydrology: Pathway* for local water flows and flood risk management.
Archaeology, cultural heritage, community benefits and Geodiversity: Soils supporting no notable cultural heritage, geodiversity nor community benefits; Soils supporting limited community/ recreational/ educational access to land.
Source of materials: Surface mineral reserves that would remain accessible for extraction.

Negligible

As for low sensitivity, but with only indirect, tenuous, and unproven links between sources of impact and soil functions.

Table 8.2 Receptor sensitivity relating to soil ecosystems

Sensitivity of topsoil and subsoil	Soil texture, field capacity days (FCD) and wetness class
High (low resilience to structural damage)	Soils with high clay and silt fractions (clays, silty clays, sandy clays, heavy silty clay loams and heavy clay loams) and organo-mineral and peaty soils where the FCD are 150 or greater; Medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams) where the FCDs are 225 or greater; and All soils in wetness class 5 and 6 (WCV and WCVI).

Medium (medium resilience to structural damage)	Clays, silty clays, sandy clays, heavy silty clay loams, heavy clay loams, silty loams and organo-mineral and peaty soils where the FCDs are fewer than 150; Medium-textured soils (silt loams, medium silty clay loams, medium clay loams and sandy clay loams) where FCDs are fewer than 225; and Sands, loamy sands, sandy loams and sandy silt loams where the FCDs are 225 or greater or are in wetness classes 3 and 4 (WCIII and WCIV).
Low (high resilience to structural damage)	Soils with a high sand fraction (sands, loamy sands, sandy loams and sandy silt loams) where the FCDs are fewer than 225 and are in wetness classes 1 and 2 (WCI and WCII).

Table 8.3 Magnitude of Impact criteria relating to agricultural land quality and soil ecosystems

Magnitude of impact (change)	Description of impacts restricting proposed land use
Major	Permanent, irreversible loss of one or more soil functions or soil volumes (including permanent sealing or land quality downgrading) over an area of more than 20ha; or loss of soil-related features (including effects from ‘temporary developments’*); or Potential for permanent improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of more than 20ha; or gain in soil-related features (including effects from ‘temporary developments’*).
Moderate	Permanent, irreversible loss of one or more soil functions or soil volumes, over an area of between 5ha and 20ha; or loss of soil-related features (including effects from ‘temporary developments’*); or Potential for improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of between 5ha and 20ha; or gain in soil related features.
Minor	Permanent, irreversible loss over an area of less than 5ha or a temporary, reversible loss of one or more soil functions or soil volumes; or temporary, reversible loss of soil-related features; or Potential for permanent improvement in one or more soil functions or soil volumes due to remediation or restoration over an area of less than 5ha; or a temporary improvement

in one or more soil functions due to remediation or restoration or off-site improvement; or temporary gain in soil-related features.

Negligible

No discernible loss or reduction or improvement of soil functions or soil volumes that restrict current or proposed land use.

*Temporary developments can result in a permanent impact if resulting disturbance or land use change causes permanent damage to soils.

Table 8.4 Level of effect criteria relating to agricultural land quality and soil ecosystems

Sensitivity	Magnitude of impact			
	Major	Moderate	Minor	Negligible
Very High	Very Large	Large or Very Large	Moderate or Large	Slight
High	Large or Very Large	Moderate or Large	Slight or Moderate	Slight
Medium	Moderate or Large	Moderate	Slight	Neutral or Slight
Low	Slight or Moderate	Slight	Neutral or Slight	Neutral or Slight

- 8.7.5. The assessment of likely significant effects to sensitive receptors would consider the sensitivity of the receptor (on a scale of very high, high, medium, low and negligible) and the magnitude of change (on a scale of large, medium, small and negligible) to determine the level of effect on a scale of major, moderate, minor and negligible. Significant effects would be determined following this through professional judgment.

Assumptions and Limitations

- 8.7.6. A detailed ALC survey would be completed to inform the ES. In the absence of such survey data, this chapter has been informed by provisional publicly available data.

9. Archaeology

9.1. Introduction

- 9.1.1. This chapter of the Scoping Report presents the scope of the detailed environmental assessment for archaeology for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site and surrounding area. It then sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.
- 9.1.2. Archaeology is defined for the purposes of this Scoping Report as below-ground remains and above-ground earthworks associated with past human activity, referred to under the umbrella term of ‘archaeological remains’ within this chapter. Archaeology differs from built heritage, which is defined for the purposes of this Scoping Report as upstanding ruins, standing structures and buildings and designed landscapes associated with past human activity.
- 9.1.3. Within this chapter, only heritage assets which incorporate archaeological remains are discussed in detail. Heritage assets which incorporate built heritage remains are discussed in detail in **Chapter 10: Built Heritage**. Heritage assets which incorporate both archaeological and built heritage remains are discussed in both chapters.

9.2. Review of Policy, Legislation, and Relevant Guidance

- 9.2.1. Legislation, planning policy and guidance relating to archaeology, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- Ancient Monuments and Archaeological Areas Act 1979¹⁷³;
- Treasure Act 1996 (as amended)¹⁷⁴;
- Burial Act 1857¹⁷⁵;
- Protection of Military Remains Act 1986¹⁷⁶;

¹⁷³ Ancient Monuments and Archaeological Areas Act 1979, available at <https://www.legislation.gov.uk/ukpga/1979/46>

¹⁷⁴ Treasure Act 1996 (amended 2023), available at <https://www.legislation.gov.uk/ukpga/1996/24/contents>

¹⁷⁵ Burial Act 1857, available at <https://www.legislation.gov.uk/ukpga/Vict/20-21/81/contents>

¹⁷⁶ Protection of Military Remains Act 1986, available at <https://www.legislation.gov.uk/ukpga/1986/35/contents>

- The Hedgerows Regulations 1997¹⁷⁷;
- Historic Buildings and Ancient Monuments Act 1953¹⁷⁸;
- National Heritage Act 1980 (as amended)¹⁷⁹.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)¹⁸⁰;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)¹⁸¹;
- National Policy Statement for Renewable Energy Infrastructure (EN-5) (2023)¹⁸²;
- National Planning Policy Framework (NPPF) (updated February 2025)¹⁸³; and
- Planning Practice Guidance – Historic Environment (PPG) (2014, updated 2019)¹⁸⁴.

Local Planning Policy

- Rother Local Plan: Core Strategy (Adopted September 2014), specifically Policy EN1 'Landscape Stewardship' and Policy EN2 'Stewardship of the Historic Built Environment'¹⁸⁵;
- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)¹⁸⁶, specifically Policy CC6 'Solar Farms', Policy HE1

¹⁷⁷ The Hedgerows Regulations 1997, available at <https://www.legislation.gov.uk/ukxi/1997/1160/contents>

¹⁷⁸ Historic Buildings and Ancient Monuments Act 1953, available at <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>

¹⁷⁹ National Heritage Act 1980 (as amended), available at <https://www.legislation.gov.uk/ukpga/1983/47/contents>

¹⁸⁰ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

¹⁸¹ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

¹⁸² Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-5), available at: https://assets.publishing.service.gov.uk/media/64252f852fa848000cec0f53/NPS_EN-5.pdf

¹⁸³ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

¹⁸⁴ Ministry of Housing, Communities and Local Government (2014), National Planning Policy Guide, available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁸⁵ Rother District Council (2014), Rother Local Plan: Core Strategy, available at: <https://rdcpb.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

¹⁸⁶ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

'Heritage Assets', Policy HE2 'Archaeology' and HE3 'Local List of Heritage Assets';

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)¹⁸⁷; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)¹⁸⁸.

National Guidance

- Standard and guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists, 2020)¹⁸⁹;
- Code of Conduct: professional ethics in archaeology (Chartered Institute for Archaeologists, 2022)¹⁹⁰;
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017)¹⁹¹;
- Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England Advice Note Twelve, 2019)¹⁹²;
- Commercial renewable energy development and the historic environment (Historic England Advice Note Fifteen, 2021)¹⁹³;
- Managing Significance in Decision-Taking in the Historic Environment (Historic England Good Practice Advice in Planning: 2, 2015)¹⁹⁴;

¹⁸⁷ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

¹⁸⁸ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

¹⁸⁹ Chartered Institute for Archaeologists (2020), Standard and guidance for historic environment desk-based assessment, available to view at <https://www.archaeologists.net/sites/default/files/2023-11/CIfA-SandG-DBA-2020.pdf>

¹⁹⁰ Chartered Institute for Archaeologists (2022), Code of Conduct: professional ethics in archaeology, available to view at <https://www.archaeologists.net/sites/default/files/2023-11/CIfA-Code-of-Conduct-2022.pdf>

¹⁹¹ Historic England (2017), The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3, available to view at <https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

¹⁹² Historic England (2019), Statements of Heritage Significance: Analysing Significance in Heritage Assets, available to view at <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>

¹⁹³ Historic England (2021), Commercial renewable energy development and the historic environment, available to view at <https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/>

¹⁹⁴ Historic England (2015), Managing Significance in Decision-Taking in the Historic Environment (Historic England Good Practice Advice in Planning: 2, available to view at <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>

- Principles of Cultural Heritage Impact Assessment in the UK (Institute of Environmental Management and Assessment, Institute of Historic Building Conservation and Chartered Institute for Archaeologists, 2021)¹⁹⁵.

Local Guidance

- Position Statement on Development: Large Scale Solar Arrays (Kent County Council 2014)¹⁹⁶;
- Specification for a Standard Desk-Based Assessment and Walkover Survey (Kent County Council, 2016)¹⁹⁷;
- Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential (Kent County Council, 2018)¹⁹⁸;
- Folkestone & Hythe District Heritage Strategy (Adopted January 2019)¹⁹⁹;
- Sussex Archaeological Standards (Local Planning Authority Archaeological Advisers in Sussex 2019)²⁰⁰.

9.3. Existing Baseline Conditions

- 9.3.1. This section of the Scoping Chapter for archaeology sets out the known baseline conditions at this (scoping) stage of the project. Further surveys and assessment are proposed to inform the technical assessment for the Environmental Statement (see details and scope of the further baseline data below under paragraphs 9.5.4 - 9.5.12).

Study Area

- 9.3.2. Following the guidance from Kent County Council and East Sussex County Council²⁰¹, a 1km study area from the Site boundary would be used for non-

¹⁹⁵ Institute of Historic Building Conservation and Chartered Institute for Archaeologists (2021), Principles of Cultural Heritage Impact Assessment in the UK, available to view at https://www.archaeologists.net/sites/default/files/2024-11/CIfA-IEMA-Principles-Cultural-Heritage-Impact-UK_2021.pdf

¹⁹⁶ Kent County Council (2014), Position Statement on Development: Large Scale Solar Arrays, available at <https://democracy.kent.gov.uk/documents/s48772/KCC%20Solar%20Policy%20Position%20Statement%20August%202014%20FINAL.pdf>

¹⁹⁷ Kent County Council (2016), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey

¹⁹⁸ Kent County Council (2018), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential

¹⁹⁹ Folkestone and Hythe District Council (2019), Folkestone & Hythe District Heritage Strategy, available at <https://www.folkestone-hythe.gov.uk/downloads/file/1461/eb-11-10-folkestone-hythe-heritage-strategy-1->

²⁰⁰ Local Planning Authority Archaeological Advisers in Sussex (2019), Sussex Archaeological Standards, available at: <https://www.eastsussex.gov.uk/environment/archaeology/heritage-planning>

²⁰¹ Kent County Council (2016), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey; Kent County Council (2018), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential; Local Planning Authority Archaeological Advisers in Sussex (2019), Sussex

designated historic assets and a study area of up to 5km from the Site boundary, informed by the Zone of Theoretical Visibility (ZTV), would be used for designated heritage assets.

Approach to the Collection of Baseline Data for Scoping

9.3.3. Baseline data has been collected using the following sources:

- Guidance produced by the Kent and East Sussex County Councils²⁰²;
- Information on designated heritage assets from the National Heritage List for England²⁰³, downloaded on 28 July 2025;
- Data on heritage assets and previous archaeological investigations from the Kent and East Sussex Historic Environment Records²⁰⁴ (HERs), obtained as a digital data extract on 04 August 2025 and 18 August 2025 respectively;
- Historical Ordnance Survey and tithe mapping; and
- Environment Agency LiDAR data.

Relevant Baseline Conditions for Scoping

9.3.4. There are no designated archaeological heritage assets within the Site boundary.

9.3.5. There are 140 HER entries within the Site, all of which are considered within this chapter. Of these records, 135 take the form of purely archaeological remains. The remaining five HER entries incorporate upstanding ruins or standing buildings in addition to archaeological remains and are thus considered within the **Chapter 10: Built Heritage**, as well as this chapter.

9.3.6. Of the 140 HER entries within the Site boundary, 107 entries relate to findspots of Bronze Age to post-medieval date. The remaining 33 HER entries consist of:

- the cropmarks of two ring ditches, likely of prehistoric date;
- the site of a medieval saltworks;

Archaeological Standards, available at: <https://www.eastsussex.gov.uk/environment/archaeology/heritage-planning>

²⁰² Kent County Council (2016), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey; Kent County Council (2018), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential; Local Planning Authority Archaeological Advisers in Sussex (2019), Sussex Archaeological Standards, available at: <https://www.eastsussex.gov.uk/environment/archaeology/heritage-planning>

²⁰³ Historic England (2025), National Heritage List for England [Online] available at: <https://historicengland.org.uk/listing/the-list/>

²⁰⁴ Kent County Council (2025), Historic Environment Record [Online] available at: <https://www.kent.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record>

- five mounds, dykes and banks of unknown, medieval and post-medieval date;
- seven assets relating to medieval or post-medieval agriculture, including the site of shepherd's huts and sheepfolds and a field system;
- four settlements of post-medieval date; the course of an abandoned post-medieval railway and a demolished post-medieval coastguard station; and
- 12 assets relating to World War II, including the site of a plane crash, AA batteries, camps, pillboxes and rifle ranges.

- 9.3.7. The plane crash site, HER DKE22374/MKE90401, is protected under the Protection of Military Remains Act 1986²⁰⁵.
- 9.3.8. A review of available tithe maps, historic Ordnance Survey maps and LiDAR imagery has identified 23 additional assets within the Site boundary (either single assets or groups of assets of the same type), which take the form of purely archaeological remains. The assets consist of the extant or below-ground remains of parish boundaries; the sites of 19th century sheepfolds, ponds, wells, small structures and now-lost field boundaries; and probable earthworks and LiDAR anomalies of uncertain origin and date.
- 9.3.9. Beyond the Site boundary and within the 5km study area there are eight Scheduled Monuments (see **Figure 2.2 within Appendix E**). Six of the eight Scheduled Monuments incorporate both archaeological remains and upstanding ruins or standing structures and buildings. These assets are therefore considered within both this chapter and the **Chapter 10: Built Heritage**. One of the eight Scheduled Monuments, a shipwreck, incorporates archaeological remains only and is therefore considered in this chapter only. The final Scheduled Monument, a World War II caisson, incorporates an upstanding structure only and is therefore not considered in this chapter, but is considered within **Chapter 10: Built Heritage**.
- 9.3.10. The closest of the Scheduled Monuments to the Site boundary considered in this chapter is NHLE 1012338 (Abandoned Medieval Church and Graveyard, Midley), which is located approximately 600m from the Site boundary. The other Scheduled Monuments consist of Medieval ecclesiastical buildings and military infrastructure related to the Napoleonic wars, the post-World War I period and World War II.
- 9.3.11. There are seven Grade I, five Grade II*, and 196 Grade II listed buildings and eight Conservation Areas within the 5km study area, discussed further in **Chapter 10: Built Heritage**. There are no World Heritage Sites, Registered Parks and Gardens, Registered Battlefields or Protected Wrecks within the 5km study area.

²⁰⁵ Protection of Military Remains Act 1986, available at <https://www.legislation.gov.uk/ukpga/1986/35/contents>

- 9.3.12. Beyond the Site boundary and within the 1km study area, there are 989 non-designated heritage assets, all of which are considered within this chapter. Of these 989, 66 incorporate standing structures and buildings and are thus considered within **Chapter 10: Built Heritage** as well as this chapter. The assets considered within this chapter include archaeological remains related to occupation, agriculture, industry, sea defences, drainage and funerary practices dating to the Bronze Age to post-medieval periods; findspots of artefacts including flint scatters; World War II military infrastructure, and undated cropmarks.

Important Receptors Identified

- 9.3.13. The following key receptors of relevance to the archaeology assessment are as follows:
- Known non-designated archaeological heritage assets within the Site boundary.
 - Currently unknown archaeological heritage assets within the Site boundary.
 - Designated archaeological heritage assets outwith the Site boundary but within the 5km study area.
 - Non-designated archaeological heritage assets outwith the Site boundary but within the 1km study area.

9.4. Environmental Measures

- 9.4.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or minimise the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on application of the EIA mitigation hierarchy which seeks to avoid, prevent, reduce and, if possible, offset likely significant effects. Specific environmental measures relevant to archaeology would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects would be undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures are proposed for inclusion within the Proposed Development.

Construction

- 9.4.2. Any heritage assets which incorporate archaeological remains within the Site which are of international or national importance would be preserved in situ through mitigation by design, such as the introduction of exclusion zones or the use of concrete ballasts for solar arrays, in areas where ground penetration foundations are not feasible.

- 9.4.3. A programme of archaeological investigation (comprising geophysical survey and, if necessary, archaeological trial trenching) would be carried out in support of the DCO Application to inform mitigation measures by design, which would avoid, minimise or reduce impacts to archaeology. These measures may include additional pre-construction archaeological investigations secured through a DCO Requirement, the introduction of exclusion zones or the use of concrete ballasts for solar arrays, in areas where ground penetration foundations are not feasible.
- 9.4.4. Construction activities would be carried out in accordance with a Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan (CTMP) and Soil Management Plan (SMP). These documents would identify measures and processes to avoid or minimise impacts to archaeology arising from activities such as excavation groundworks, vehicle movements and spoil storage, which must be followed throughout the construction phase of the Proposed Development. An Outline CEMP (oCEMP), Outline CTMP (oCTMP) and Outline SMP (oSMP) would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.

Operation

- 9.4.5. Operation activities would be carried out in accordance with an Operational Environmental Management Plan (OEMP), Landscape and Ecology Management Plan (LEMP) and SMP. These documents would identify measures and processes to avoid or minimise impacts to archaeology arising from activities such as vehicle movements and spoil storage, which must be followed throughout the operation phase of the Proposed Development. An Outline OEMP (oOEMP), Outline LEMP (oLEMP) and Outline SMP (oSMP) would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.

Decommissioning

- 9.4.6. Decommissioning activities would be carried out in accordance with a Decommissioning Environmental Management Plan (DEMP) and SMP. These documents would identify measures and processes to avoid or minimise impacts to archaeology arising from activities such as removal of solar infrastructure and vehicle movements, which must be followed throughout the decommissioning phase of the Proposed Development. An Outline Decommissioning Environmental Management Plan (oDEMP) and oSMP would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.
- 9.4.7. Piling for solar arrays would be removed at the same angle at which it was inserted. This would be detailed in and secured by the oDEMP.

9.5. Scope of the Assessment

Consultation Undertaken to Date

- 9.5.1. An overview of consultation undertaken to date for archaeology, and how this has informed the scope of the assessment, is provided in Table 9.1.

Table 9.1 Consultation Undertaken to Date

Date	Consultee	Summary
28 July 2025 – 01 August 2025	Senior Archaeological Officer for Kent County Council	The Applicant presented the proposed study areas and assessment methodology (which have been subsequently presented in this chapter) to the Senior Archaeological Officer for Kent County Council for review and comment. The Senior Archaeological Officer for Kent County Council confirmed that the 1km study area for baseline data collection was sufficient and provided a list recommended sources for baseline data collection. No comments on the proposed assessment methodology were received. The Applicant requested baseline data not yet incorporated into the Kent HER, but which is required to be included in baseline conditions of the Site and study area from the Senior Archaeological Officer for Kent County Council, and gratefully received an article regarding the archaeological investigation of a newly-discovered Tudor wreck at Dungeness.
28 July 2025 and 08 August 2025	Archaeological Advisor for East Sussex Council	The Applicant presented the proposed study areas and assessment methodology (which have been subsequently presented in this chapter) to the Archaeological Officer for East Sussex Council for review and comment. The Archaeological Officer for East Sussex Council confirmed that the proposals for study areas and assessment methodology were appropriate.
01 August 2025 - ongoing	Historic England	The Applicant presented the proposed study areas and assessment methodology (which have been subsequently presented in this chapter) to Historic England and received acknowledgement of the consultation on 10 August 2025. Historic England responded to the Applicant on 9 September 2025 confirming their agreement with the proposed study area for baseline data collection and the proposed methodology for settings impact assessment. However, they advised that the study area for setting impact assessment of designated heritage assets should be informed by ZTV data and may be required to extend further than 5km.

Date	Consultee	Summary
		Historic England provided the Applicant with an information form to complete for input into Historic England's proposal for the use of their Enhanced Advisory Service for the DCO Application on 18 August 2025. The Applicant returned the completed form on 20 August 2025. At the time of the submission of this Scoping Report, the Enhanced Advisory Service agreement between Historic England and the Applicant was still to be finalised.

Effects Scoped Out from Detailed Assessment

- 9.5.2. Table 9.2 presents the Archaeology matters that are unlikely to result in significant effects and which, therefore, are proposed to be scoped out from the detailed assessment.

Table 9.2 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Physical and settings impacts to Scheduled Monument NHLE 1003605: Hope All Saints', remains of church, during construction, operation and decommissioning	The asset consists of the remains of a medieval parish church surviving as upstanding ruins and buried archaeological remains. Parish churches were designed for congregational worship and provided a focus for the religious activity of their local communities, including the burial of their dead. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 1.26km from South Brooks B at its closest point. It lies c.125m from the nearest road. The asset is situated on level ground north-west of New Romney on Romney Marsh and is located within an area of agricultural land. Its setting encompasses the medieval village which it served. This medieval village (non-designated heritage asset HER TR 02 SW 2) is recorded as lying next to the asset. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, although it is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles, the distance of the asset from that road

Potential Effect	Rationale to be Scoped Out
	precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting. Nevertheless, any contributions that the setting of the asset does make to its significance would not be changed by the Proposed Development due to the distance of the Site boundary from the asset, which precludes any sensory changes to the assets setting arising from construction, maintenance or decommissioning activities within the Site boundary. The proximity of the asset from the nearest road means that sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles are possible. However, any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation including maintenance phase. Therefore, any sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles would not change any contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument NHLE 1004205: Lade Fort, during construction, operation and decommissioning	The asset is a late 18th century coastal battery (referring to any place where artillery is positioned to allow guns to cover a particular area such as a line of communication or the approaches to a defended location) surviving as upstanding ruins and buried archaeological remains. The asset was built during the French Revolutionary Wars to defend the adjacent landing beaches and a major offshore anchorage. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 2.4km from South Brooks B at its closest point. The asset is situated near the seafront at Lydd-on-Sea and faces the sea, providing clear lines of sight for firing onto the beach and anchorage. Its internal layout demonstrates its purpose as an autonomous self-contained battery. The asset is best appreciated in its immediate vicinity.

Potential Effect	Rationale to be Scoped Out
	<u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site. It is not anticipated that any roads within the vicinity of the asset would be used by construction, maintenance or decommissioning vehicles and thus there would be no impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The aspects of the asset's setting which contribute to its significance are its location next to the coast and the direct sightlines between the asset and the sea which are embedded into the asset's design. The Site boundary is not part of the asset's setting. The distance from the asset to the Site boundary and the local road network to be used for access to the Site boundary precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument NHLE 1005119: Three acoustic early warning devices 2360m east of Jack's Court, during construction, operation and decommissioning	The asset consists of three acoustic early warning devices surviving as standing structures and buried archaeological remains. Acoustic early warning devices were built during the 1920s to detect attacks by aircraft and were a pre-cursor to the development of radar. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 1.2km from South Brooks C at its closest point. It lies c.600m from the nearest road. The asset is situated on a man-made island surrounded by a lake formed by gravel extraction on the Kent coastline at Greatstone-on-Sea and is positioned to pick up aircraft noise from the east, across the Strait of Dover. There is no public access to the asset and the land is part of RSPB Dungeness, who organises yearly visits.

Potential Effect	Rationale to be Scoped Out
	<u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, the distance of the asset from any roads precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The aspects of the asset's setting which contribute to its significance are its location close to the coast and the historic relationship between the asset and the Strait of Dover to the east. The Site boundary is not part of the asset's setting. The distance from the asset to the Site boundary and the local road network to be used for access to the Site boundary precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument NHLE 1011803: Part of a Cistercian grange, north of New Romney High Street, also known as Romney Priory, during construction, operation and decommissioning	The asset consists of the remains of a medieval monastic grange surviving as upstanding ruins and buried archaeological remains. Monastic granges were farms owned and run by a monastic community whose purpose was to provide food and raw materials for consumption by the parent monastic house and provide surpluses for sale for profit. Granges could be located at a considerable distance from the parent monastic house. Granges were an important part of medieval monastic and rural life. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 900m from South Brooks B at its closest point. It lies c.10m from the nearest road. The asset is situated to the north of New Romney High Street, in the grounds of an 18th century house called St John's Priory House. The medieval agricultural land used by the asset is no longer present, and the ability to appreciate any historical associations between the

Potential Effect	Rationale to be Scoped Out
	asset and its surrounding landscape has been lost due to post-medieval and modern building within the settlement of New Romney. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles. However, this road is a well-used A-road already subject to frequent vehicular traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the asset's physical remains. Moreover, the asset is physically shielded from any changes to air quality caused by construction, maintenance or decommissioning traffic by an existing intervening building. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within the Site boundary that could change the contribution that setting makes to the significance of the asset. The proximity of the asset to the nearest road means that sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles are possible. However, this road is already well-used. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation including maintenance phase. Thus, any sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles would not change any contribution that setting makes to the significance of the asset.

Potential Effect	Rationale to be Scoped Out
	In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument NHLE 1012338: Abandoned Medieval Church and Graveyard, Midley, during construction, operation and decommissioning	The asset consists of the remains of a medieval church and associated graveyard surviving as upstanding ruins and buried archaeological remains. Churches were designed for congregational worship and provided a focus for the religious activity of their local communities, including the burial of their dead. The significance of the asset derives from its architectural, archaeological and historic interest, particularly its early use of a very rare brick for building in the region. This asset is located approximately 600m from South Brooks A at its closest point. It lies c.510m from the nearest road. The asset is situated within an area of agricultural land. The medieval village which the asset served is no longer present, although it is recorded in the HER as a Deserted Medieval Village. Approximately 90m to the south-west of the asset is a modern railway line. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, although it is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles, the distance of the asset from that road precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting and the modern railway has caused the ability to appreciate any historical association between the asset and the Site boundary to be lost. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction,

Potential Effect	Rationale to be Scoped Out
Physical and settings impacts to Scheduled Monument NHLE 1017353: Martello tower no 28 at Rye Harbour, during construction, operation and decommissioning	maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset.
	In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
	The asset consists of the remains of a gun tower surviving as standing structural and buried archaeological remains. Martello towers were constructed between 1805 and 1810 to defend the south-eastern coast of England against the threat of ship-borne invasion by Napoleonic forces. The significance of the asset derives from its architectural, archaeological and historic interest, especially when viewed as one of a series of three towers that were specifically designed to protect Rye Harbour and the sluices of the contemporary Royal Military Canal.
	This asset is located approximately 4.2km from South Brooks A at its closest point and 75m from the nearest road.
	The asset is situated within the grounds of a holiday village, overlooking the River Rother to the east and Rye Harbour to the west.
	<u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not currently anticipated that any roads within the vicinity of the asset would be used by construction, maintenance or decommissioning vehicles. On this basis, no impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic are expected.
	<u>Settings impacts</u> The aspects of the asset's setting which contribute to its significance are its location close to the coast and the historic relationship between the asset and the River Rother and Rye Harbour to the south.
	The Site boundary is not part of the asset's setting.
	The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the

Potential Effect	Rationale to be Scoped Out
	Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of detailed assessment.
Physical and settings impacts to Scheduled Monument NHLE 1440703: Wooden Wreck on Camber Sands, during construction, operation and decommissioning	The asset consists of the remains of a shipwreck of a boat built between the 17th and 19th centuries surviving as buried archaeological remains. It may be the remains of the brig 'The Avon' which was stranded and damaged near Rye Harbour in 1852. The significance of the asset derives from its archaeological and historic interest. This asset is located approximately 2.1km from South Brooks C at its closest point and 225m from the nearest road. The asset is situated on Camber Sands in Rother within the intertidal zone. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary or within the surrounding road network. <u>Settings impacts</u> The aspects of the asset's setting which contributes to its significance is its location on Camber Sands. The Site boundary does not form part of this setting. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary and thus would not change any contribution that that setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to findspots within the Site boundary	As findspots, these artefacts have been removed from the Site boundary and the heritage significance of their former locations would not be changed by the Proposed Development. They are therefore proposed to be scoped out from the detailed assessment

Potential Effect	Rationale to be Scoped Out
during construction, operation and decommissioning	as they are not considered sensitive receptors. However, the findspots would be included within the baseline data to inform the assessment of archaeological potential.
Physical and settings impacts to known non-designated heritage assets outside of the Site boundary (but within the 1km study area) which incorporate archaeological remains (except those scoped in below) during construction, operation and decommissioning	The assets consist of prehistoric to modern archaeological remains relating to occupation, agriculture, religious and funerary practices, industry, transport, military and utilities infrastructure and communications. The significance of the assets derives from their archaeological and historic interest. The assets are located at varying distances from the Site boundary, the closest being 30m from the Site boundary, but within the 1km study area. The assets lie within agricultural or coastal land or settlements. <u>Physical impacts</u> It is not anticipated that archaeological remains associated with the assets would encroach into the Site boundary. There is therefore not anticipated to be any physical impacts to the assets from any changes to air quality, ground vibration or soil compaction arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether any of the roads which the assets are located close to would be used by construction, maintenance or decommissioning vehicles. However, these roads are already subject to regular vehicular traffic, including local farm traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the asset's physical remains. <u>Settings impacts</u> The aspects of the settings of those assets which lie within settlements which contributes to their significance is their location within an urban area and their proximity to contemporary heritage assets within each settlement. The aspects of the asset's settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site does not form part of these settings. The aspects of the settings of those assets which lie within agricultural or coastal land which contributes to their significance is their location within undeveloped land and their proximity to contemporary heritage assets within the surrounding agricultural or coastal landscape. The aspects of the asset's settings which

Potential Effect	Rationale to be Scoped Out
	contribute to their significance are therefore restricted to their immediate vicinities. The Site does not form part of these settings. The distance of the Site from the assets and their immediate settings precludes any sensory changes to the asset's settings arising from construction, maintenance or decommissioning activities within the Site and thus would not change any contribution that setting makes to the significance of the assets. The proximity of some of the assets to the nearest roads means that sensory changes to the asset's settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already subject to traffic, including local farm traffic. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation including maintenance phase. Thus, any sensory changes to the asset's settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that that setting makes to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to currently unknown non-designated heritage assets outside of the Site boundary (but within the 1km study area) which incorporate archaeological remains during construction, operation and decommissioning	The assets are likely to consist of prehistoric or historic archaeological remains associated with occupation, agriculture, industry and defence. The significance of the assets is likely to derive from their archaeological and historic interest. The assets are anticipated to be located at varying distances from the Site boundary, but within the 1km study area. The assets are anticipated to lay within agricultural or coastal land or settlements. <u>Physical impacts</u> It is not anticipated that archaeological remains associated with the assets would encroach into the Site or the local road network to be used by construction, maintenance and decommissioning vehicles. There is therefore not anticipated to be any physical impacts to the assets from any changes to air quality, ground vibration or compaction arising from construction, maintenance or decommissioning activities within and around the Site. <u>Settings impacts</u>

Potential Effect	Rationale to be Scoped Out
	The aspects of the settings of those assets which lie within settlements which are anticipated to contribute to their significance is their location within an urban area and their proximity to contemporary heritage assets within each settlement. The aspects of the asset's settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site does not form part of these settings. The aspects of the settings of those assets which lie within agricultural or coastal land which are anticipated to contribute to their significance is their location within undeveloped land and their proximity to contemporary heritage assets within the surrounding agricultural or coastal landscape. The aspects of the asset's settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site does not form part of these settings. The distance of the Site from the assets precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within the Site and thus would not change any contribution that setting makes to the significance of the assets. The proximity of some of the assets to the nearest roads means that sensory changes to the asset's settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already subject to traffic, including local farm traffic. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation including maintenance phase. Thus, any sensory changes to the asset's settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that that setting makes to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.

Likely Significant Effects Scoped into the Detailed Assessment

Potential Effect	Rationale to be Scoped In
Physical and settings impacts to known non-designated heritage assets within the Site boundary which incorporate archaeological remains (except those scoped out above) during construction, operation and decommissioning. These comprise the following HER entries: • HER DKE22374/MKE90401 (Crash site of Hawker Hurricane I) • HER MKE123313 (Light Anti Aircraft (Diver) Battery LI32) • HER MKE123314 (Light Anti Aircraft (Diver) Battery LI33) • HER MKE123317 (Light Anti Aircraft (Diver) Battery LI35) • HER MKE3775 (Saltworks/earthwork) • HER MKE3776 (Mound/earthwork) • HER MKE3779 (Mound/earthwork) • HER MKE3789 (Field system/earthwork) • HER MKE3790 (Second World War Diver Anti Aircraft Battery and military trenches) • HER MKE3791 (Mounds/earthwork) • HER MKE3795 (Rectangular bank/earthwork) • HER MKE3796 (Curvilinear Dyke/earthwork) • HER MKE39519 (Site of pillbox) • HER MKE39520 (Site of pillbox) • HER MKE43534 (Site of a 19th century shepherd's hut) • HER MKE43536 (The site of a shepherd's hut lydd parish)	Construction, maintenance and decommissioning activity within the Site has the potential to directly impact on these assets and may impact on the contribution that setting makes to their significance, with potential for significant effects to occur.

Potential Effect	Rationale to be Scoped In
• HER MKE44382 (Lydd Camp/Airfield 121) • HER MKE62763 Lydd & New Romney Branch Railway • HER MKE8760 (Diver AA battery) • HER MKE88136 (Lower Agney) • HER MKE88140 (Little Scotney) • HER MKE88177 (Newland) • HER MKE88180 (Sheepfold west of Tor Wall) • HER MKE88181 (Sheepfold north west of Horses Bones Farm) • HER MKE88311 (Sheepfold on Romney Salts) • HER MKE91231 (Cropmark of a ring ditch, to the north-west of Hawthorn Cottages) • HER MKE91232 (Cropmark of a double ring ditch, to the north of Newland Bungalow) • HER MWX44099 (Great Stone Coastguard Station) • HER MWX44100 (Rifle Range, Greatstone-on-Sea) • HER MWX51447 (Possible post-medieval stack stands) • HER MWX51457 (possible Second World War bomb craters) • HER MWX51485 (Possible Second World War anti aircraft gun emplacement) ...and the newly identified archaeological heritage assets of: • HA1 (Sites of sheepfolds) • HA3 (Footpaths shown on tithe maps) • HA4 (Footpaths shown on OS maps) • HA6 (Boundary stones)	

Potential Effect	Rationale to be Scoped In
- HA8 (Possible extraction pit) - HA9 (Possible earthworks) - HA10 (LiDAR anomalies) - HA12 and HA13 (Field boundaries) - HA14 (Possible enclosure) - HA16 (Sites of structures)	
Physical and settings impacts to currently unknown non-designated heritage assets within the Site boundary which incorporate archaeological remains during construction, operation and decommissioning (apart from findspots).	There remains uncertainty about the extent and significance of currently unknown archaeological heritage assets within the Site boundary and therefore the potential for significant effects is unknown.
Physical and settings impacts to non-designated heritage asset HER MKE62761, Romney, Hythe and Dymchurch Light Railway during construction, operation and decommissioning	The asset is located c. 10m from South Brooks C and consist of the structural and archaeological remains of a historic railway. Archaeological remains associated with the asset may encroach into the Site boundary. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur.
Physical and settings impacts to non-designated heritage asset HER MKE123325 Light Anti-Aircraft (Diver) battery during construction, operation and decommissioning	This asset is located c. 10m from South Brooks D and consists of the archaeological remains of a World War II light anti-aircraft battery. Archaeological remains associated with the asset may encroach into the Site boundary. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on

Potential Effect	Rationale to be Scoped In
Physical and settings impacts to non-designated heritage asset HER MKE111022 (Route of Second World War Pipeline Under the Ocean during construction, operation and decommissioning	this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur. This asset is located c. 10m from South Brooks C and consists of the archaeological remains of a World War II pipeline. Archaeological remains associated with the asset may encroach into the Site boundary. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur.

9.6. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 9.6.1. The following additional sources would be used to inform the EIA (post-scoping):
- Geophysical survey of the Site boundary;
 - Walkover survey (site visit) of the Site boundary;
 - British Geological Survey geological mapping and borehole data;
 - Relevant volumes of the Southern Rivers Palaeolithic Project and the English Rivers Palaeolithic Project;
 - Aerial photographic mapping data available to view on the Historic England Aerial Archaeology Mapping Explorer and held by the Kent and East Sussex HERs;
 - Satellite imagery available to view on Google Earth Pro and Bing Maps;
 - Maps and other relevant primary and secondary sources held in the Kent and East Sussex Archives;
 - Portable Antiquities Scheme (PAS) data;
 - Locally listed heritage assets;
 - Kent Historic Landscape Characterisation and East Sussex Landscape Character Assessment;
 - South-East Research Framework Resource Assessment and Research Agenda;
 - Place and field name data;
 - Relevant Victoria County Histories;
 - Relevant antiquarian writings; and
 - Other relevant published and unpublished archaeological reports and local histories.

Stages of Assessment

- 9.6.2. For each phase of the Proposed Development (construction, operation, and decommissioning), a staged assessment would be carried out using professional judgement and considering the national legislation, guidance and best practice documents listed in Section 9.4 above.
- 9.6.3. The first stage of assessment is understanding heritage assets. This stage includes:

- describing the asset (what it is and what is known about it);
- ascribing significance (a description of the heritage interest of the asset from which the asset derives its significance); and
- attributing importance (a scaled measure of the degree to which the significance of that asset should be protected).

9.6.4. The ascribing of significance within this assessment would be made with reference to the types of heritage interests an asset has as described by Historic England (historical, archaeological, architectural and artistic/aesthetic, although it is acknowledged that this list of interests is by no means exhaustive).

9.6.5. The second stage of assessment is evaluating the consequence of change. This would be undertaken in three separate analytical stages:

- understanding change (a factual statement of how the Proposed Development would change a heritage asset or its setting, including how it is experienced);
- assessing impact (a scaled measure of the degree to which any change would impact on the heritage interest of the asset and therefore its significance); and
- weighting the effect (the measure that brings together the magnitude of the impact and the heritage asset's importance to assess the significance of effect that the change represents).

9.6.6. The staged methodology outlined above would be presented within the ES as follows:

- Description of the significance of each assessed asset, including what is valued about it (i.e. what the asset's significance is derived from).
- Description of how the Proposed Development may change these values and therefore impact on the heritage significance, through both physical and settings impacts.
- Discussion of embedded and/or additional mitigation which may avoid or minimise physical or settings impacts to the asset.
- Assessment of whether the predicted impact(s) following embedded and/or additional mitigation constitutes harm to the significance of the asset, and if so, the severity of this harm. This is referred to below as 'magnitude of impact'.
- Assessment of the nature and severity of residual effects, obtained through combining the importance of the asset and the magnitude of impact (referred to below as 'significance of effect').

9.6.7. Chapter 5: Approach to the EIA sets out the general approach to assessing the significance of cumulative effects, which would be followed in the preparation of the archaeological assessment.

Assumptions and Limitations

9.6.8. The following difficulties and uncertainties have been identified:

- Existing records for the historic environment do not record all archaeological heritage assets. This would be addressed through the desk-based assessment (including a site visit) to identify previously unrecorded assets and assess the potential for below ground archaeological remains. The geophysical survey would also further investigate the potential for below ground archaeological remains.
- Information held by public data sources is generally considered to be reliable; however, the following general points are noted:
 - Documentary sources are rare before the medieval period;
 - While it is accepted that historic documents may reflect the biases of their authors and must be understood within their historical context, any use of such sources in assessing archaeological potential would involve professional judgment. This includes consideration of the document's original purpose and function;
 - HER information can be limited because opportunities for research, fieldwork and discovery depend on the situation of commercial development and occasional research projects, rather than the result of a more structured research framework. A lack of data within the HER does not necessarily equal an absence of archaeology; this lack of data would be addressed through further archaeological investigation (geophysical survey);
 - Where archaeological sites are identified solely from aerial imagery without confirmation from archaeological excavation or supporting evidence in the form of findspots for example, it is possible the interpretation may be revised in the light of further investigation;
 - The significance of sites can be difficult to identify from HER data, depending on the accuracy and reliability of the original source; and
 - There can often be a lack of dating evidence for archaeological sites; reasonable assumptions based on the form of geophysical anomalies/cropmarks and records of previous finds would address this.
- The geophysical survey technique to be employed is magnetometry. Magnetometry has limitations in that certain types of sub-surface remains may, under certain circumstances, be more likely to be identified by other survey techniques, such as earth resistance, ground penetrating radar or electro-magnetic methods, which measure different geophysical properties. However, given the success of preceding surveys in the wider area, magnetometry is considered the best methodology for assessing the Site.

10. Built Heritage

10.1. Introduction

- 10.1.1. This chapter of the Scoping Report presents the scope of detailed environmental assessment for built heritage for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site and surrounding area. It then sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.
- 10.1.2. Built heritage is defined for the purposes of this Scoping Report as upstanding ruins, standing structures and buildings, and designed landscapes associated with past human activity. It differs from archaeology, which is defined for the purposes of this Scoping Report as below-ground remains, and above-ground earthworks associated with past human activity.
- 10.1.3. Within this chapter, only heritage assets which incorporate built heritage remains are discussed in detail. Heritage assets which incorporate archaeological remains are discussed in detail in **Chapter 9: Archaeology**. Heritage assets which incorporate both archaeological and built heritage remains are discussed in both chapters.

10.2. Review of Policy, Legislation, and Relevant Guidance

- 10.2.1. Legislation, planning policy and guidance relating to built heritage, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- Ancient Monuments and Archaeological Areas Act 1979²⁰⁶;
- Planning (Listed Buildings and Conservation Areas) Act 1990²⁰⁷;
- Protection of Military Remains Act 1986²⁰⁸;

²⁰⁶ Ancient Monuments and Archaeological Areas Act 1979, available at <https://www.legislation.gov.uk/ukpga/1979/46>

²⁰⁷ Planning (Listed Buildings and Conservation Areas) Act 1990, available at <https://www.legislation.gov.uk/ukpga/1990/9/contents>

²⁰⁸ Protection of Military Remains Act 1986, available at <https://www.legislation.gov.uk/ukpga/1986/35/contents>

- Historic Buildings and Ancient Monuments Act 1953²⁰⁹;
- National Heritage Act 1980 (as amended)²¹⁰.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)²¹¹;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)²¹²;
- National Policy Statement for Renewable Energy Infrastructure (EN-5) (2023)²¹³;
- National Planning Policy Framework (NPPF) (updated February 2025)²¹⁴; and
- Planning Practice Guidance – Historic Environment (PPG) (2014, updated 2019)²¹⁵.

Local Planning Policy

- Rother Local Plan: Core Strategy (Adopted September 2014), specifically Policy EN1 'Landscape Stewardship' and Policy EN2 'Stewardship of the Historic Built Environment'²¹⁶;
- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)²¹⁷, specifically Policy CC6 'Solar Farms', Policy HE1 'Heritage Assets' and Policy HE3 'Local List of Heritage Assets';

²⁰⁹ Historic Buildings and Ancient Monuments Act 1953, available at <https://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents>

²¹⁰ National Heritage Act 1980 (as amended), available at <https://www.legislation.gov.uk/ukpga/1983/47/contents>

²¹¹ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

²¹² Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

²¹³ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-5), available at: https://assets.publishing.service.gov.uk/media/64252f852fa848000cec0f53/NPS_EN-5.pdf

²¹⁴ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²¹⁵ Ministry of Housing, Communities and Local Government (2014), National Planning Policy Guide, available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²¹⁶ Rother District Council (2014), Rother Local Plan: Core Strategy, available at: <https://rdcpb.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

²¹⁷ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)²¹⁸; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)²¹⁹.

National Guidance

- Standard and guidance for historic environment desk-based assessment (Chartered Institute for Archaeologists, 2020)²²⁰;
- Code of Conduct: professional ethics in archaeology (Chartered Institute for Archaeologists, 2022)²²¹;
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England, 2017)²²²;
- Statements of Heritage Significance: Analysing Significance in Heritage Assets (Historic England Advice Note Twelve, 2019)²²³;
- Commercial renewable energy development and the historic environment (Historic England Advice Note Fifteen, 2021)²²⁴;
- Managing Significance in Decision-Taking in the Historic Environment (Historic England Good Practice Advice in Planning: 2, 2015)²²⁵; and

²¹⁸ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

²¹⁹ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

²²⁰ Chartered Institute for Archaeologists (2020), Standard and guidance for historic environment desk-based assessment, available to view at <https://www.archaeologists.net/sites/default/files/2023-11/CIfA-SandG-DBA-2020.pdf>

²²¹ Chartered Institute for Archaeologists (2022), Code of Conduct: professional ethics in archaeology, available to view at <https://www.archaeologists.net/sites/default/files/2023-11/CIfA-Code-of-Conduct-2022.pdf>

²²² Historic England (2017), The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3, available to view at <https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

²²³ Historic England (2019), Statements of Heritage Significance: Analysing Significance in Heritage Assets, available to view at <https://historicengland.org.uk/images-books/publications/statements-heritage-significance-advice-note-12/heag279-statements-heritage-significance/>

²²⁴ Historic England (2021), Commercial renewable energy development and the historic environment, available to view at <https://historicengland.org.uk/images-books/publications/commercial-renewable-energy-development-historic-environment-advice-note-15/heag302-commercial-renewable-energy-development-historic-environment/>

²²⁵ Historic England (2015), Managing Significance in Decision-Taking in the Historic Environment (Historic England Good Practice Advice in Planning: 2, available to view at <https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/>

- Principles of Cultural Heritage Impact Assessment in the UK (Institute of Environmental Management and Assessment, Institute of Historic Building Conservation and Chartered Institute for Archaeologists, 2021)²²⁶.

Local Guidance

- Position Statement on Development: Large Scale Solar Arrays (Kent County Council 2014)²²⁷;
- Specification for a Standard Desk-Based Assessment and Walkover Survey (Kent County Council, 2016)²²⁸;
- Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential (Kent County Council, 2018)²²⁹;
- Folkestone & Hythe District Heritage Strategy (Adopted January 2019)²³⁰; and
- Sussex Standards for Historic Building Archaeology (Local Planning Authority Archaeological Advisers in Sussex 2019)²³¹.

10.3. Existing Baseline Conditions

- 10.3.1. This section of the Scoping Chapter for built heritage sets out the known baseline conditions at this (scoping) stage of the project. Further surveys and assessment are proposed to inform the detailed technical assessment for the Environmental Statement (see details and scope of the further baseline data below under Section 10.7).

Study Area

- 10.3.2. Following the guidance from Kent County Council and East Sussex County Council²³², a 1km study area from the Site boundary would be used for non-

²²⁶ Institute of Historic Building Conservation and Chartered Institute for Archaeologists (2021), Principles of Cultural Heritage Impact Assessment in the UK, available to view at https://www.archaeologists.net/sites/default/files/2024-11/CIfA-IEMA-Principles-Cultural-Heritage-Impact-UK_2021.pdf

²²⁷ Kent County Council (2014), Position Statement on Development: Large Scale Solar Arrays, available at <https://democracy.kent.gov.uk/documents/s48772/KCC%20Solar%20Policy%20Position%20Statement%20August%202014%20FINAL.pdf>

²²⁸ Kent County Council (2016), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey

²²⁹ Kent County Council (2018), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known Palaeolithic Potential

²³⁰ Folkestone and Hythe District Council (2019), Folkestone & Hythe District Heritage Strategy, available at <https://www.folkestone-hythe.gov.uk/downloads/file/1461/eb-11-10-folkestone-hythe-heritage-strategy-1->

²³¹ Local Planning Authority Archaeological Advisers in Sussex (2019), Sussex Standards for Historic Building Archaeology, available at: <https://www.eastsussex.gov.uk/environment/archaeology/heritage-planning>

²³² Kent County Council (2016), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey; Kent County Council (2018), Manual of Specifications Part B: Specification for a Standard Desk-Based Assessment and Walkover Survey for Areas with Known

designated historic assets and a study area of up to 5km from the Site boundary, informed by the Zone of Theoretical Visibility (ZTV), would be used for designated historic assets.

Approach to the Collection of Baseline Data for Scoping

10.3.3. Baseline data was collected using the following sources:

- Guidance produced by the Kent and East Sussex County Councils²³³;
- Information on designated heritage assets from the National Heritage List for England²³⁴, , downloaded on 28 July 2025;
- Data on heritage assets and previous archaeological investigations from the Kent and East Sussex Historic Environment Records²³⁵ (HERs), obtained as a digital data extract on 04 August 2025 and 14 August 2025 respectively; and
- Historical Ordnance Survey and tithe mapping.

Relevant Baseline Conditions for Scoping

10.3.4. There are no designated built heritage assets within the Site boundary.

10.3.5. There are 140 HER entries within the Site boundary, only five of which incorporate upstanding ruins or standing buildings and are thus considered within this chapter. These five built heritage assets also incorporate archaeological remains and are thus considered within **Chapter 9: Archaeology**, as well as this chapter. The five built heritage assets are the post-medieval settlements of Lower Agney, Little Scotney and Newland, a World War II diver AA battery and the Lydd & New Romney Branch Railway. The remaining 135 HER entries incorporate purely archaeological remains and so are not discussed in this chapter but are discussed in **Chapter 9: Archaeology**.

10.3.6. Beyond the Site boundary and within the 5km study area there are eight Scheduled Monuments. Six of the eight Scheduled Monuments incorporate both upstanding ruins or standing structures and buildings and archaeological remains. These assets are therefore considered within both this chapter and **Chapter 9: Archaeology**. One of the eight Scheduled Monuments, a World War II caisson, incorporates an upstanding structure only and is therefore considered in this chapter only. The final Scheduled Monument, a shipwreck,

Palaeolithic Potential; Local Planning Authority Archaeological Advisers in Sussex (2019), Sussex Standards for Historic Building Archaeology, available at:

<https://www.eastsussex.gov.uk/environment/archaeology/heritage-planning>

²³³ Ibid.

²³⁴ Historic England (2025), National Heritage List for England [Online] available at:

<https://historicengland.org.uk/listing/the-list/>

²³⁵ Kent County Council (2025), Historic Environment Record [Online] available at:

<https://www.kent.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record>

incorporates archaeological remains only and is therefore not considered in this chapter, but is considered within **Chapter 9: Archaeology**.

- 10.3.7. The closest of the Scheduled Monuments to the Site boundary considered in this chapter is NHLE 1012338 (Abandoned Medieval Church and Graveyard, Midley), which is located approximately 600m from the Site boundary; this asset is also considered within **Chapter 9: Archaeology** as it also incorporates archaeological remains. The other Scheduled Monuments consist of Medieval ecclesiastical buildings and military infrastructure related to the Napoleonic wars, the post-World War I period and World War II.
- 10.3.8. There are seven Grade I, five Grade II*, and 196 Grade II listed buildings and eight Conservation Areas within the 5km study area. These include churches and funerary monuments, houses, public houses, farmhouses, agricultural buildings, street furniture and military, telecommunications and coastal infrastructure such as lighthouses. The closest listed buildings to the Site boundary are the Grade II Listed Buildings NHLE 1068911 (Scotney) and NHLE 1068913 (Jack's Court/Jacques Court Farmhouse), which are located 115m – 135m from the Site boundary.
- 10.3.9. There are no World Heritage Sites, Registered Parks and Gardens, Registered Battlefields or Protected Wrecks within the 5km study area.
- 10.3.10. Beyond the Site boundary and within the 1km study area there are 989 non-designated heritage assets, 66 of which incorporate standing structures or buildings and are thus considered within this chapter. The remaining 923 non-designated heritage assets consist of purely archaeological remains and are thus considered within **Chapter 9: Archaeology** only. The 66 built heritage assets considered within this chapter include upstanding structural remains related to post-medieval and modern occupation, agriculture, religion, industry, transport, sea defences, utilities and military infrastructure.

Important Receptors Identified

- 10.3.11. The following key receptors of relevance to the built heritage assessment are as follows:
- Known non-designated built heritage assets within the Site boundary;
 - Currently unknown built heritage assets within the Site boundary;
 - Designated built heritage assets outwith the Site boundary and within the 5km study area; and
 - Non-designated built heritage assets outwith the Site boundary and within the 1km study area.

10.4. Environmental Measures

- 10.4.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or minimise the potential for an adverse

significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on application of the EIA mitigation hierarchy which seeks to avoid, prevent, reduce and, if possible, offset likely significant effects. Specific environmental measures relevant to built heritage would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects would be undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures are proposed for inclusion within the Proposed Development.

Construction

- 10.4.2. Any heritage assets which take the form of built heritage within the Site boundary which are of international or national importance would be preserved in situ through mitigation by design, such as the introduction of exclusion zones.
- 10.4.3. If built heritage assets of significance are proposed to be demolished as part of the Proposed Development, a programme of pre-construction historic building recording would be secured through a DCO Requirement to mitigate impacts to built heritage.
- 10.4.4. Construction activities would be carried out in accordance with a Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan (CTMP) and Soil Management Plan (SMP). These documents would identify measures and processes to avoid or minimise impacts to built heritage arising from activities such as excavation groundworks, vehicle movements and spoil storage, which must be followed throughout the construction phase of the Proposed Development. An Outline CEMP (oCEMP), Outline CTMP (oCTMP) and Outline SMP (oSMP) would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.

Operation

- 10.4.5. Operation activities would be carried out in accordance with an Operational Environmental Management Plan (OEMP), Landscape and Ecology Management Plan (LEMP) and SMP. These documents would identify measures and processes to avoid or minimise impacts to built heritage from activities such as vehicle movements and spoil storage, which must be followed throughout the operation phase of the Proposed Development. An Outline OEMP (oOEMP), Outline LEMP (oLEMP) and oSMP would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.

Decommissioning

- 10.4.6. Decommissioning activities would be carried out in accordance with a Decommissioning Environmental Management Plan (DEMP) and SMP. These

documents would identify measures and processes to avoid or minimise impacts to built heritage from activities such as removal of solar infrastructure and vehicle movements, which must be followed throughout the decommissioning phase of the Proposed Development. An Outline Decommissioning Environmental Management Plan (oDEMP) and oSMP would be submitted in support of the DCO Application. The final documents would be approved post consent and secured through the DCO Requirements.

10.5. Scope of the Assessment

Consultation Undertaken to Date

- 10.5.1. An overview of consultation undertaken to date for built heritage, and how this has informed the scope to the assessment, is provided in Table 10.1.

Table 10.1 Consultation Undertaken To Date

Date	Consultee	Summary
01 August 2025	Conservation Officer for Folkstone and Hythe District Council	The Applicant presented the proposed study areas and assessment methodology (which have been subsequently presented in this chapter) to the Conservation Officer for Folkstone and Hythe District Council for review and comment. No comments on the proposals have been provided by Folkstone and Hythe District Council to date.
01 August 2025 - ongoing	Historic England	The Applicant presented the proposed study areas and assessment methodology (which have been subsequently presented in this chapter) to Historic England and received acknowledgement of the consultation on 10 August 2025. Historic England responded to the Applicant on 9 September 2025 confirming their agreement with the proposed study area for baseline data collection and the proposed methodology for settings impact assessment. However, they advised that the study area for setting impact assessment of designated heritage assets should be informed by ZTV data and may be required to extend further than 5km. Historic England provided the Applicant with an information form to complete for input into Historic England's proposal for the use of their Enhanced Advisory Service for the DCO Application on 18 August 2025. The Applicant returned the completed form on 20 August 2025. At the time of the submission of this Scoping Report, the Enhanced Advisory Service agreement between Historic England and the Applicant was still to be finalised.

Effects Scoped Out from Detailed Assessment

- 10.5.2. Table 10.2 presents the built heritage matters that are unlikely to result in significant effects and which, therefore, are proposed to be scoped out from the detailed assessment.

Table 10.2 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Physical and settings impacts to Scheduled Monument <i>NHLE 1003605: Hope All Saints', remains of church</i> , during construction, operation and decommissioning	<u>Asset information</u> The asset consists of the remains of a medieval parish church surviving as upstanding ruins and buried archaeological remains. Parish churches were designed for congregational worship and provided a focus for the religious activity of their local communities, including the burial of their dead. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 1.26km from South Brooks B at its closest point. It lies c.125m from the nearest road. The asset is situated on level ground north-west of New Romney on Romney Marsh and is located within an area of agricultural land. The medieval village which the asset served is no longer present. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, although it is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles, the distance of the asset from that road precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting. Nevertheless, any contributions that the setting of the asset does make to its significance would not be changed by the Proposed Development due to the distance of the Site boundary from the asset, which precludes any sensory changes to the asset's setting

Potential Effect

Rationale to be Scoped Out

arising from construction, maintenance or decommissioning activities within the Site boundary.

The proximity of the asset from the nearest road means that sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles are possible. However, any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles would not change any contribution that the setting makes to the significance of the asset.

In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.

Physical and settings impacts to Scheduled Monument *NHLE 1004205: Lade Fort*, during construction, operation and decommissioning

Asset information

The asset is a late 18th century coastal battery surviving as upstanding ruins and buried archaeological remains. The asset was built during the French Revolutionary Wars to defend the adjacent landing beaches and a major offshore anchorage. The significance of the asset derives from its architectural, archaeological and historic interest.

This asset is located approximately 2.4km from South Brooks B at its closest point.

The asset is situated near the seafront at Lydd-on-Sea and faces the sea, providing clear lines of sight for firing onto the beach and anchorage. Its internal layout demonstrates its purpose as an autonomous self-contained battery. The asset is best appreciated in its immediate vicinity.

Physical impacts

The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not anticipated that any roads within the vicinity of the asset would be used by construction, maintenance or decommissioning vehicles and thus there would be no impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic.

Settings impacts

Potential Effect	Rationale to be Scoped Out
	The aspects of the asset's setting which contribute to its significance are its location next to the coast and the direct sightlines between the asset and the sea which are embedded into the asset's design. The Site boundary is not part of the asset's setting. The distance from the asset to the Site boundary and the local road network to be used for access to the Site boundary precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument <i>NHLE 1005119: Three acoustic early warning devices 2360m east of Jack's Court</i> , during construction, operation and decommissioning	<u>Asset Information</u> The asset consists of three acoustic early warning devices surviving as standing structures and buried archaeological remains. Acoustic early warning devices were built during the 1920s to detect attacks by aircraft. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 1.2km from South Brooks C at its closest point. It lies c.600m from the nearest road. The asset is situated on a man-made island surrounded by a lake formed by gravel extraction on the Kent coastline at Greatstone-on-Sea and is positioned to pick up aircraft noise from the east, across the Strait of Dover. There is no public access to the asset, and the land is part of RSPB Dungeness, who organises yearly visits. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, the distance of the asset from any roads precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u>

Potential Effect	Rationale to be Scoped Out
	The aspects of the asset's setting which contribute to its significance are its location close to the coast and the historic relationship between the asset and the Strait of Dover to the east. The Site boundary is not part of the asset's setting. The distance from the asset of the Site boundary and the local road network to be used for access to the Site boundary precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument <i>NHLE 1011803: Part of a Cistercian grange, north of New Romney High Street, also known as Romney Priory</i> , during construction, operation and decommissioning	<u>Asset information</u> The asset consists of the remains of a medieval monastic grange surviving as upstanding ruins and buried archaeological remains. Monastic granges were farms owned and run by a monastic community whose purpose was to provide food and raw materials for consumption by the parent monastic house and provide surpluses for sale for profit. Granges could be located at a considerable distance from the parent monastic house. Granges were an important part of medieval monastic and rural life. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 900m from South Brooks B at its closest point. It lies c.10m from the nearest road. The asset is situated to the north of New Romney High Street, in the grounds of an 18th century house called St John's Priory House. The medieval agricultural land used by the asset is no longer present, and the ability to appreciate any historical associations between the asset and its surrounding landscape has been lost due to post-medieval and modern building within the settlement of New Romney. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any

Potential Effect	Rationale to be Scoped Out
	changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles. However, this road is a well-used A-road already subject to frequent vehicular traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the asset's physical remains. Moreover, the asset is physically shielded from any changes to air quality caused by construction, maintenance or decommissioning traffic by an existing intervening building. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within the Site boundary that could change the contribution that setting makes to the significance of the asset. The proximity of the asset to the nearest road means that sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles are possible. However, this road is already well-used. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the asset's setting arising from construction, maintenance or decommissioning vehicles would not change any contribution that setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument <i>NHLE 1012338: Abandoned Medieval Church</i>	<u>Asset information</u> The asset consists of the remains of a medieval church and associated graveyard surviving as upstanding ruins and buried archaeological remains. Churches were designed for congregational worship and provided a focus for the religious activity of their local communities, including the burial of their dead. The significance of the asset derives from its architectural, archaeological and historic

Potential Effect	Rationale to be Scoped Out
<i>and Graveyard, Midley, during construction, operation and decommissioning</i>	interest, particularly its early use of a very rare brick for building in the region. This asset is located approximately 600 m from South Brooks A at its closest point. It lies c.510m from the nearest road. The asset is situated within an area of agricultural land. The medieval village which the asset served is no longer present, although it is recorded in the HER as a Deserted Medieval Village. Approximately 90m to the south-west of the asset is a modern railway line. The wider setting of the asset therefore does not contribute to an understanding of the asset and thus the asset is best appreciated from within its immediate vicinity. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Likewise, although it is not yet known whether the nearest road to the asset would be used by construction, maintenance or decommissioning vehicles, the distance of the asset from that road precludes impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic. <u>Settings impacts</u> The setting of the asset is unlikely to contribute to its significance. The Site boundary is not part of the asset's setting and the modern railway has caused the ability to appreciate any historical association between the asset and the Site boundary to be lost. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Scheduled Monument <i>NHLE</i>	<u>Asset information</u> The asset consists of the remains of a gun tower surviving as standing structural and buried archaeological remains. Martello towers were constructed between 1805 and 1810 to defend the

Potential Effect	Rationale to be Scoped Out
1017353: <i>Martello tower no 28 at Rye Harbour</i> , during construction, operation and decommissioning	south-eastern coast of England against the threat of ship-borne invasion by Napoleonic forces. The significance of the asset derives from its architectural, archaeological and historic interest, especially when viewed as one of a series of three towers which were specifically designed to protect Rye Harbour and the sluices of the contemporary Royal Military Canal. This asset is located approximately 4.2km from South Brooks A at its closest point and 75m from the nearest road. The asset is situated within the grounds of a holiday village, overlooking the River Rother to the east and Rye Harbour to the west. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not currently anticipated that any roads within the vicinity of the asset would be used by construction, maintenance or decommissioning vehicles. On this basis, no impacts to the asset's physical remains arising from any changes to air quality or ground vibration caused by construction, maintenance or decommissioning traffic are expected. <u>Settings impacts</u> The aspects of the asset's setting which contribute to its significance are its location close to the coast and the historic relationship between the asset and the River Rother and Rye Harbour to the south. The Site boundary is not part of the asset's setting. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary (including the movement of construction, maintenance or decommissioning vehicles) that could change the contribution that the setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to	<u>Asset information</u>

Potential Effect	Rationale to be Scoped Out
Scheduled Monument <i>NHLE 1415588: Phoenix Caisson off Littlestone-on-Sea</i> , during construction, operation and decommissioning	The asset consists of the remains of a breakwater component of a Mulberry Harbour surviving as upstanding ruins and buried archaeological remains. Mulberry Harbours were a key element of the Normandy landings and consisted of pre-fabricated harbours whose purpose was to allow a landing without the necessity of having to immediately capture a heavily fortified port in order to re-supply the invasion. Caissons provided a sheltered anchorage for transhipment of supplies directly onto the beach. The significance of the asset derives from its architectural, archaeological and historic interest. This asset is located approximately 2.4km from South Brooks C at its closest point. The asset is situated within the English Channel, where it rests on the seabed and is exposed at low tide. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the asset that there would be no physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary or within the surrounding road network. <u>Settings impacts</u> The aspects of the asset's setting which contributes to its significance is its location within the sea. The Site boundary does not form part of this setting. The distance of the Site boundary from the asset precludes any sensory changes to the asset's setting arising from construction, maintenance or decommissioning activities within and around the Site boundary and thus would not change any contribution that that setting makes to the significance of the asset. In conclusion, no significant effects to the physical remains or setting of this asset are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Grade I and II* Listed Buildings within the 5km study area during construction,	<u>Asset information</u> The Grade I and II* Listed Buildings within the 5km and 1km study areas are primarily ecclesiastical buildings of medieval to modern date, although there is one Grade II* listed dwelling of medieval date (NHLE 1025299, 3 and 4 West Street) and one Grade II* listed lighthouse of modern date (NHLE 1390640, Dungeness Lighthouse).

Potential Effect	Rationale to be Scoped Out
operation and decommissioning	The ecclesiastical buildings were designed for congregational worship and provided a focus for the religious activity of their local communities. The dwelling was located such that its occupants could easily access nearby social and economic opportunities as well as sufficient resources. The lighthouse was constructed to ensure the safety of passing maritime traffic. The significance of the assets derives from their architectural, archaeological and historic interest. The closest asset is located 570m from South Brooks D. All assets apart from Dungeness Lighthouse are located next to the main roads of the settlements of Brookland, Lydd, Ivychurch, New Romney, Old Romney, and St. Mary in the Marsh. They were built to serve these communities. Dungeness Lighthouse is located on the shore of Dungeness. It was built to serve both the local community and passing maritime traffic. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the assets that there would be no physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether the nearest roads to the assets would be used by construction, maintenance or decommissioning vehicles. However, these roads are already well-used roads subject to frequent vehicular traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the assets' physical remains. <u>Settings impacts</u> As buildings built for their immediate communities, the settings of these assets are restricted to the settlements in which they are located; in the case of Dungeness Lighthouse, its setting includes the section of the coastline which it monitors. The Site boundary is not part of the assets' settings. The distance of the Site boundary from the assets precludes any sensory changes to the assets' settings arising from construction, maintenance or decommissioning activities within the Site boundary and would not change any contribution that these settings make to the significance of these assets.

Potential Effect	Rationale to be Scoped Out
	The proximity of the assets to the nearest roads means that sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already well-used. Any changes would arise from the intermittent passing of plant and vehicles and would therefore be of very short duration and minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that these settings make to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Grade II Listed Buildings within the settlements of Brenzett, Brookland, Dungeness, East Guideford, Littleton-on-Sea, Lydd, Lydd-on-Sea, Ivychurch, New Romney, Old Romney, Rye and St. Mary in the Marsh during construction, operation and decommissioning	<u>Asset information</u> The Grade II Listed Buildings within the settlements of Brenzett, Brookland, Dungeness, East Guideford, Littleton-on-Sea, Lydd, Lydd-on-Sea, Ivychurch New Romney, Old Romney, Rye and St. Mary in the Marsh are medieval to modern in date and consist of: ecclesiastical buildings; dwellings; farmhouses and agricultural buildings; funerary monuments; public houses and hotels; industrial buildings; military, communications and utility infrastructure; transport systems; and garden structures such as walls and sundials. The assets were built for a variety of reasons, but all were built to serve the occupants of the settlements in which they were located. The significance of the assets derives from their architectural, archaeological and historic interest. The closest asset is located approximately 300m from South Brooks D. All assets are located next to the main or minor roads of the settlements of Brenzett, Brookland, Dungeness, East Guideford, Littleton-on-Sea, Lydd, Lydd-on-Sea, Ivychurch New Romney, Old Romney, Rye and St. Mary in the Marsh. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the assets that there would be no physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary.

Potential Effect	Rationale to be Scoped Out
	It is not yet known whether the nearest roads to the assets would be used by construction, maintenance or decommissioning vehicles. However, these roads are already subject to vehicular traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the assets' physical remains. <u>Settings impacts</u> As buildings built for their immediate communities, the settings of these assets are restricted to the settlements in which they are located. The Site boundary is not part of the assets' settings. The distance of the Site boundary from the assets precludes any sensory changes to the assets' settings arising from construction, maintenance or decommissioning activities within the Site boundary that would change the contribution that these settings make to the significance of the assets. The proximity of the assets to the nearest roads means that sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already well-used by the local community. Any changes would arise from the intermittent passing of plant and vehicles and would therefore be of very short duration and minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that these settings make to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to isolated Grade II Listed Buildings within the 5km study area (apart from those scoped in below) during construction, operation and decommissioning	<u>Asset information</u> The isolated Grade II Listed Buildings apart from those scoped in below are of medieval to modern date and consist of the ruins of ecclesiastical buildings, dwellings, farmhouses and agricultural buildings, funerary monuments, public houses, and military infrastructure. The ecclesiastical buildings, funerary monuments and public houses were located close to the communities they served, which may or may not still be extant. The farmhouses and agricultural buildings were located to provide the occupants with easy access to the lands

Potential Effect	Rationale to be Scoped Out
	and livestock that they farmed. The military infrastructure was located away from surrounding settlement to allow for efficient military operations. The significance of the assets derives from their architectural, archaeological and historic interest. The closest asset, NHLE 1121912 (Farmhouse at Westbrook), is located approximately 295m from South Brooks A. Most of the assets are roadside structures which are located next to A-roads or unclassified roads but several are located at the end of farm access tracks. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the assets that there would be no physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. Local farm access tracks outside of the Site boundary are not anticipated to be used by construction, maintenance or decommissioning vehicles and thus those assets located at the end of farm access tracks would not be physically impacted by any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the local road network. It is not yet known whether the roads which the roadside assets are located next to would be used by construction, maintenance or decommissioning vehicles. However, these roads are already subject to vehicular traffic, including local farm traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the assets' physical remains. <u>Settings impacts</u> As assets built for occupation, local community religious worship and the receiving of military radar signals, the settings of these assets are restricted to the roadsides or surrounding undeveloped agricultural land in which they are located. The Site boundary is not part of the assets' settings.

Potential Effect	Rationale to be Scoped Out
	The distance of the Site boundary from the assets precludes any sensory changes to the assets' settings arising from construction, maintenance or decommissioning activities within the Site boundary that would change the contribution that these settings make to the significance of the assets. Local farm access tracks outside of the Site boundary are not anticipated to be used by construction, maintenance or decommissioning vehicles and thus there would be no sensory changes to the settings of those assets arising from construction, maintenance or decommissioning activities within the local road network. It is not yet known whether the roads which the roadside assets are located next to would be used by construction, maintenance or decommissioning vehicles. The proximity of the assets to the roads means that sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already in use by the local community and local farm traffic. Any changes would arise from the intermittent passing of plant and vehicles and would therefore be of very short duration and minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that these settings make to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical impacts to Grade II Listed Buildings NHLE 1068911 (Scotney) and NHLE 1068913 (Jack's Court/Jacques Court Farmhouse) during construction, operation and decommissioning	<u>Asset information</u> These assets are of post-medieval date and consist of farmhouses. They were sited to afford their occupants with social and economic opportunities, reliable access to resources and to provide easy access to the lands and livestock that their occupants farmed. The significance of the assets derives from their architectural, archaeological and historic interest. NHLE 1068911 (Scotney) is located at the end of a farm access track and lies c.115m from South Brooks A. NHLE 1068913 (Jack's Court/Jacques Court Farmhouse) is located next to a minor road in Lydd and lies c.135m from South Brooks D.

Potential Effect	Rationale to be Scoped Out
	The Site boundary is located at a sufficient distance from the assets that there would be no physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether local farm access tracks outside of the Site boundary are anticipated to be used by construction, operation or decommissioning vehicles. However, these tracks are already subject to local farm traffic. The introduction of additional construction, operation and decommissioning traffic, all of which would pass only intermittently, is not anticipated to physically impact NHLE 1068911 (Scotney) through any changes to air quality or ground vibration arising from construction, operation or decommissioning activities within the local road network. It is not yet known whether the road which NHLE 1068913 (Jack's Court/Jacques Court Farmhouse) is located next to would be used by construction, maintenance or decommissioning vehicles. However, this road is already subject to vehicular traffic, including local farm traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the asset's physical remains. In conclusion, no significant effects to the physical remains of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to Conservation Areas within the 5km study area during construction, operation and decommissioning	<u>Asset information</u> The Conservation Areas within the 5km and 1km study area lie within the post-medieval – modern settlements of Brookland, Dungeness, Littleton-on-Sea, Lydd, Lydd-on-Sea, New Romney, Old Romney and Rye. The Conservation Areas were designated to recognise and protect their special character and architectural interest. The closest Conservation Area, Lydd, is located approximately 430m from South Brooks D. <u>Physical impacts</u> The Site boundary is located at a sufficient distance from the Conservation Areas that there would be no physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary.

Potential Effect	Rationale to be Scoped Out
	It is not yet known whether the roads which run through the Conservation Areas would be used by construction, maintenance or decommissioning vehicles. However, these roads are already subject to frequent vehicular traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the character of the Conservation Areas. <u>Settings impacts</u> The Conservation Areas lie within a wider area of generally level ground and form part of a wider settlement pattern of small, nucleated settlements dispersed throughout an agricultural and marshland landscape. Listed and non-listed historic buildings within the Conservation Areas as well as the plan form of the settlements (including their local road networks) contribute to the specialness of the Conservation Areas' characters. The agricultural land surrounding the Conservation Areas of Brookland, Dungeness, Lydd-on-Sea, Old Romney and Rye does not contribute to the special character of the Conservation Areas, but does provide views into and out of the Conservation Areas and form a green belt around the settlements which enhances the appreciation of them as self-contained entities. Due to the distance of the Site boundary from the Conservation Areas, the Site boundary does not form part of these Conservation Areas or, where present, the agricultural land surrounding them. This is especially true of Lydd, Littleton-on-Sea and New Romney Conservation Areas, which are surrounded by modern development on all sides. This development has caused the ability to directly appreciate any historical association between the Conservation Areas and their surrounding agricultural land to be lost and, due to the flat topography of the wider area, obstruct or prevent views into and out of the Conservation Areas. Thus, there would be no changes to the assets' character arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether the roads which run through the Conservation Areas would be used by construction, maintenance or decommissioning vehicles. The contribution of these roads to the special characters of the Conservation Areas means that changes to the assets' characters arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already in use by the local community and local farm traffic. Any changes would arise from the

Potential Effect	Rationale to be Scoped Out
	intermittent passing of plant and vehicles and would therefore be of very short duration and minimally perceptible, particularly during the operation phase. Thus, any changes to the assets' characters arising from construction, maintenance or decommissioning vehicles would not change any contribution that those characters make to the significance of the assets. In conclusion, no significant effects to the physical remains or characters of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.
Physical and settings impacts to known non-designated heritage assets which incorporate upstanding structural remains outside of the Site boundary (but within the 1km study area) (apart from those scoped in below) during construction, operation and decommissioning	<u>Asset information</u> The assets consist of standing structures and buildings relating to medieval to modern occupation, agriculture, religious and funerary practices, and military infrastructure. The significance of the assets derives from their architectural, archaeological and historic interest. The assets are located at varying distances from the Site boundary, but within the 1km study area. The assets lie within agricultural land or settlements. <u>Physical impacts</u> It is not anticipated that structural remains associated with the assets would encroach into the Site boundary. There is therefore not anticipated to be any physical impacts to the assets from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary. It is not yet known whether any of the roads which the assets are located close to would be used by construction, maintenance or decommissioning vehicles. However, these roads are already subject to regular vehicular traffic, including local farm traffic. The introduction of additional construction, maintenance and decommissioning traffic, all of which would pass only intermittently, is not anticipated to cause changes to the surrounding air quality or to levels of ground vibration that are sufficient to impact the assets' physical remains. <u>Settings impacts</u> The settings of those assets that lie within settlements, which are anticipated to contribute to their significance, are their location within an urban area and their proximity to contemporary heritage assets within each settlement. The aspects of the assets' settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site boundary does not form part of these settings.

Potential Effect	Rationale to be Scoped Out

The aspects of the settings of those assets which lie within agricultural or coastal land, which are anticipated to contribute to their significance, are their location within undeveloped land and their proximity to contemporary heritage assets within the surrounding agricultural or coastal landscape. The aspects of the assets' settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site boundary does not form part of these settings.

The distance of the Site boundary from the assets precludes any sensory changes to the assets' settings arising from construction, maintenance or decommissioning activities within the Site boundary and thus would not change any contribution that setting makes to the significance of the assets.

The proximity of some of the assets to the nearest roads means that sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already subject to traffic, including local farm traffic. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that that setting makes to the significance of the assets.

In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.

Physical and settings impacts to currently unknown non-designated heritage assets which incorporate upstanding structural remains outside of the Site boundary (but within the 1km study area) during construction, operation and decommissioning

Asset information

The assets are likely to consist of upstanding structural remains associated with occupation, agriculture, industry and defence. The significance of the assets is likely to derive from their architectural, archaeological and historic interest.

The assets are anticipated to be located at varying distances from the Site boundary, but within the 1km study area.

The assets are anticipated to lay within agricultural or coastal land or within settlements.

Physical impacts

It is not anticipated that structural remains associated with the assets would encroach into the Site boundary or the road network

Potential Effect	Rationale to be Scoped Out
	which would be used by construction, maintenance or decommissioning vehicles. There is therefore not anticipated to be any physical impacts to the asset from any changes to air quality or ground vibration arising from construction, maintenance or decommissioning activities within the Site boundary or within the surrounding road network. <u>Settings impacts</u> The aspects of the settings of those assets which lie within settlements which are anticipated to contribute to their significance is their location within an urban area and their proximity to contemporary heritage assets within each settlement. The aspects of the assets' settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site boundary does not form part of these settings. The aspects of the settings of those assets which lie within agricultural or coastal land which are anticipated to contribute to their significance is their location within undeveloped land and their proximity to contemporary heritage assets within the surrounding agricultural or coastal landscape. The aspects of the assets' settings which contribute to their significance are therefore restricted to their immediate vicinities. The Site boundary does not form part of these settings. The distance of the Site boundary from the assets precludes any sensory changes to the assets' settings arising from construction, maintenance or decommissioning activities within the Site boundary and thus would not change any contribution that setting makes to the significance of the assets. The proximity of some of the assets to the nearest roads means that sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles are possible. However, these roads are already subject to traffic, including local farm traffic. Any changes would arise from the intermittent passing of plant and vehicles and would be of very short duration. The changes would thus be minimally perceptible, particularly during the operation phase. Thus, any sensory changes to the assets' settings arising from construction, maintenance or decommissioning vehicles would not change any contribution that that setting makes to the significance of the assets. In conclusion, no significant effects to the physical remains or settings of these assets are anticipated. This effect is therefore proposed to be scoped out of the detailed assessment.

Likely Significant Effects Scoped into the Detailed Assessment

Potential Effect	Rationale to be Scoped In
Settings impacts to Grade II Listed Buildings NHLE 1068911 (Scotney) and NHLE 1068913 (Jack's Court/Jacques Court Farmhouse) during construction, operation and decommissioning	These assets are of post-medieval date and consist of farmhouses. They were sited to afford their occupants with social and economic opportunities, reliable access to resources and to provide easy access to the lands and livestock that their occupants farmed. The significance of the assets derives from their architectural, archaeological and historic interest. NHLE 1068911 (Scotney) is located at the end of a farm access track and lies c.115m from South Brooks A. NHLE 1068913 (Jack's Court/Jacques Court Farmhouse) is located next to a minor road in Lydd and lies c.135m from South Brooks D. Construction, maintenance and decommissioning activity within the Site boundary and surrounding network has the potential to impact on the contribution that setting makes to their significance, with potential for significant effects to occur.
Physical and settings impacts to known non-designated heritage assets which incorporate built heritage remains within the Site boundary during construction, operation and decommissioning.	Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on these assets and may impact on the contribution that setting makes to their significance, with potential for significant effects to occur.
These comprise the following HER entries: • HER MKE88136 (Little Agney) • HER MKE88140 (Little Scotney) • HER MKE88177 (Newland) • HER MKE8760 (Diver AA battery) • HER MKE62763 Lydd & New Romney Branch Railway)	
Physical and settings impacts to currently unknown non-designated heritage assets which incorporate built heritage	There remains uncertainty about the extent and significance of currently unknown built heritage assets within the Site boundary and therefore the potential for significant effects is unknown.

Potential Effect	Rationale to be Scoped In
remains within the Site boundary during construction, operation and decommissioning	
Physical and settings impacts to non-designated heritage asset HER MKE88281 Belgar (which lies outside the Site boundary but within the 1km study area) during construction, operation and decommissioning	The asset is located c. 10m from South Brooks C and consists of a standing historic farm building. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur.
Physical and settings impacts to non-designated heritage asset HER MKE88274 Hart's Farm (which lies outside the Site boundary but within the 1km study area) during construction, operation and decommissioning	The asset is located c. 10m from South Brooks E and consists of a standing historic farm building. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur.
Physical and settings impacts to non-designated heritage asset HER MKE62761, Romney, Hythe and Dymchurch Light Railway (which lies outside the Site boundary but within the 1km study area) during construction, operation and decommissioning	The asset is located c. 10m from South Brooks C and consists of the structural and archaeological remains of a historic railway. Construction, maintenance and decommissioning activity within the Site boundary has the potential to directly impact on this asset and may impact on the contribution that setting makes to its significance, with potential for significant effects to occur.

10.6. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 10.6.1. The following additional sources would be used to inform the EIA (post-scoping):
- field visits to confirm baseline setting of heritage assets;
 - aerial photographic mapping data available to view on the Historic England Aerial Archaeology Mapping Explorer and held by Kent and East Sussex HERs;
 - satellite imagery available to view on Google Earth Pro and Bing Maps;
 - maps and other relevant primary and secondary sources held in the Kent and East Sussex Archives;

- locally listed heritage assets;
- Conservation Areas Appraisals and/or Management Plans;
- Kent Historic Landscape Characterisation and East Sussex Landscape Character Assessment;
- South-East Research Framework Resource Assessment and Research Agenda;
- place and field name data;
- relevant Victoria County Histories;
- relevant antiquarian writings; and
- other relevant published and unpublished archaeological reports and local histories.

Stages of Assessment

- 10.6.2. For each phase of the Proposed Development (construction, operation and decommissioning), a staged assessment would be carried out using professional judgement and considering the national legislation, guidance and best practice documents listed in Section 10.4 above:
- 10.6.3. The first stage of assessment is understanding heritage assets. This stage includes:
- describing the asset (what it is and what is known about it);
 - ascribing significance (a description of the heritage interest of the asset from which the asset derives its significance); and
 - attributing importance (a scaled measure of the degree to which the significance of that asset should be protected).
- 10.6.4. The ascribing of significance within this assessment would be made with reference to the types of heritage interests an asset has as described by Historic England (historical, archaeological, architectural and artistic/aesthetic, although it is acknowledged that this list of interests is by no means exhaustive).
- 10.6.5. The second stage of assessment is evaluating the consequence of change. This would be undertaken in three separate analytical stages:
- understanding change (a factual statement of how the Proposed Development would change a heritage asset or its setting, including how it is experienced);
 - assessing impact (a scaled measure of the degree to which any change would impact on the heritage interest of the asset and therefore its significance); and
 - weighting the effect (the measure that brings together the magnitude of the impact and the heritage asset's importance to assess the significance of effect that the change represents).

- 10.6.6. The staged methodology outlined above would be presented within the ES as follows:
- Description of the significance of each assessed asset, including what is valued about it (i.e. what the asset's significance is derived from).
 - Description of how the Proposed Development may change these values and therefore impact on the heritage significance, through both physical and settings impacts.
 - Discussion of embedded and/or additional mitigation which may avoid or minimise physical or settings impacts to the asset.
 - Assessment of whether the predicted impact(s) following embedded and/or additional mitigation constitutes harm to the significance of the asset, and if so, the severity of this harm. This is referred to below as 'magnitude of impact'.
 - Assessment of the nature and severity of residual effects, obtained through combining the importance of the asset and the magnitude of impact (referred to below as 'significance of effect').
- 10.6.7. **Chapter 5: Approach to the EIA** sets out the general approach to assessing the significance of cumulative effects, which would be followed in the preparation of the built heritage assessment.

Assumptions and Limitations

- 10.6.8. The following difficulties and uncertainties have been identified:
- Existing records for the historic environment do not record all built heritage assets. This would be addressed through the desk-based assessment (including a site visit) to identify previously unrecorded built heritage assets.
 - Information held by public data sources is generally considered to be reliable; however, the following general points are noted:
 - Documentary sources are rare before the medieval period;
 - While it is accepted that historic documents may reflect the biases of their authors and must be understood within their historical context, any use of such sources in assessing archaeological potential would involve professional judgment. This includes consideration of the document's original purpose and function;
 - HER information can be limited because opportunities for research, fieldwork and discovery depend on the situation of commercial development and occasional research projects, rather than the result of a more structured research framework. A lack of data within the HER does not necessarily equal an absence of built heritage; this lack of data would be addressed through the site visit; and
- 10.6.9. The significance of sites can be difficult to identify from HER data, depending on the accuracy and reliability of the original source.

11. Landscape and Visual

11.1. Introduction

- 11.1.1. This chapter of the Scoping Report presents the scope of the detailed environmental assessment for Landscape and Visual for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site and surrounding area. It concludes by setting out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment, and by outlining the method that would be used to undertake the detailed environmental assessment.
- 11.1.2. Landscape effects relate to changes to the landscape as a resource, including physical changes to the fabric or individual elements of the landscape, its aesthetic or perceptual qualities, and landscape character.
- 11.1.3. Visual effects relate to changes to existing views of identified visual receptors (people), from the loss or addition of features within their view due to the construction, operation and decommissioning of the Proposed Development. For example, this may be residents, people at work, or people travelling on Public Rights of Way (PRoW).
- 11.1.4. Landscape effects and visual effects would therefore be assessed and reported separately within this chapter.
- 11.1.5. The LVIA would be undertaken with reference to other environmental topics, including ecology, heritage, arboriculture and glint and glare assessments.

11.2. Review of Policy, Legislation, and Relevant Guidance

- 11.2.1. **Chapter 4: Planning Policy Context** of the Scoping Report sets out an overview of the legislation, planning policy and guidance relevant to informing the scope of the Environmental Impact Assessment (EIA). These would be kept under review during the preparation of the LVIA, and any emerging policy or legislation would be considered as appropriate. Those most pertinent to Landscape and Visual, and relevant to the Proposed Development at the time of writing comprise:

Legislation

- The European Landscape Convention (2022)²³⁶;

²³⁶ Council of Europe Landscape Convention as amended by the 2016 Protocol (Council of Europe Treaty Series No. 176) (2022)

- The Planning Act 2008²³⁷;
- Planning (Listed Building and Conservation Areas) Act 1990²³⁸;
- The Town and Country Planning (Tree Preservation) (England) Regulations 2012²³⁹; and
- The Hedgerow Regulations 1997²⁴⁰.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)²⁴¹ with particular regard to Section 5.10 as well as Paragraphs 4.7.1, 5.10.1, and 5.10.6;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)²⁴² with particular regard to Paragraphs 2.10.96 to 2.10.98;
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023)²⁴³ with particular regard to Paragraphs 2.9.7 to 2.9.19 and 2.10.5 to 2.10.8; and
- National Planning Policy Framework (NPPF) (updated February 2025)²⁴⁴.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)²⁴⁵;

²³⁷ Planning Act 2008, available at: <https://www.legislation.gov.uk/ukpga/2008/29/contents>

²³⁸ Planning (Listed Building and Conservation Areas) Act 1990, available at: <https://www.legislation.gov.uk/ukpga/1990/9/contents>

²³⁹ The Town and Country Planning (Tree Preservation) (England) Regulations 2012, available at: <https://www.legislation.gov.uk/uksi/2012/605/contents>

²⁴⁰ The Hedgerow Regulations 1997, available at: <https://www.legislation.gov.uk/uksi/1997/1160/contents/made>

²⁴¹ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

²⁴² Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

²⁴³ Department for Energy Security and Net Zero (2023), National Policy Statement for Energy Networks Infrastructure (EN-5), available at: <https://assets.publishing.service.gov.uk/media/655dc25e046ed400148b9dca/nps-electricity-networksinfrastructure-en5.pdf>

²⁴⁴ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²⁴⁵ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)²⁴⁶;
- Rother District Council Core Strategy (Adopted September 2024)²⁴⁷;
- Rother District Council Development and Site Allocations Local Plan (Adopted December 2019)²⁴⁸; and
- Rother District Council Local Plan 2020 – 2040 Draft (Regulation 18) Version (April 2024)²⁴⁹.

National Guidance

- Planning Practice Guidance: The Natural Environment (2024)²⁵⁰;
- Planning Practice Guidance: Light Pollution (2019)²⁵¹; and
- Planning Practice Guidance: Renewable and Low Carbon Energy (2023)²⁵².

Local Guidance

- Guidance Note 01/21: The Reduction of Obtrusive Light²⁵³

11.3. Existing Baseline Conditions

- 11.3.1. This section of the Scoping Chapter for Landscape and Visual sets out the known baseline conditions at this stage of the project. It is noted that further surveys and assessment are proposed to inform the technical assessment for the Environmental Statement (ES), details of which are set out in the Assessment Methodology section of this chapter.

11.4. Study Area

- 11.4.1. The LVIA study area identifies the geographic area across which significant landscape or visual effects may occur as a result of the Proposed Development

²⁴⁶ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

²⁴⁷ Rother District Council (2014) Rother Local Plan Core Strategy, available at:

<https://rdcpb.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

²⁴⁸ Rother District Council (2019) Development and Site Allocations Local Plan, available at:

https://rdcpb.blob.core.windows.net/website-uploads/2020/01/DaSA_Adopted_December_2019_Web.pdf

²⁴⁹ Rother District Council (2024) Rother Local Plan 2020 – 2040 Draft (Regulation 18) Version, available at:

https://rdcpb.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan_Reg-18_version_Final.pdf

²⁵⁰ Ministry of Housing, Communities and Local Government (2016, updated 2025), Planning Practice Guidance: Natural Environment, available at: <https://www.gov.uk/guidance/natural-environment>

²⁵¹ Ministry of Housing, Communities and Local Government (2014), Planning Practice Guidance: Light Pollution, available at: <https://www.gov.uk/guidance/light-pollution>

²⁵² Ministry of Housing, Communities and Local Government (2023), Planning Practice Guidance: Renewable and low carbon energy, available at: <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

²⁵³ The Institution of Lighting Professionals (2021), Guidance Note 01/21: The Reduction of Obtrusive Light, available at: <https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>

and has been developed with reference to Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)²⁵⁴.

- 11.4.2. GLVIA3 paragraph 5.2 states *“the study area should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner.”*
- 11.4.3. To understand the extent of the landscape over which the Proposed Development may be significantly influenced, an initial area of search of 5km from the Site boundary was first investigated via a desk-based review including a series of Zone of Theoretical Visibility (ZTV) maps (**Figures 11.1-11.4 within Appendix E**). The 5km area of search was based on professional judgement and experience with schemes of a similar scale and context and their resulting extent of significant effects, indicating that 5km is an appropriate initial spatial boundary.
- 11.4.4. Computed-generated ZTVs were prepared using the Viewshed tool in QGIS GIS software to indicate where in the local landscape the different components of the Proposed Development would be theoretically visible from. Each ZTV has assumed a viewing height of 1.6m but are otherwise based on different height and terrain parameters, as indicated in the respective drawing notes on each ZTV figure.
- 11.4.5. With reference to **Figures 11.1 and 11.2** (See **Appendix E**), which model the zone of theoretical visibility of the solar PV infrastructure within the Site boundary as shown on the Indicative Masterplan (see **Appendix D**):
- There would be theoretical visibility of the solar PV infrastructure within the Site boundary across much of the Study Area and up to 5km from the Site boundary without taking into account built features and vegetation.
 - The landform is generally flat but subtle dips would reduce the extent over which the solar PV within the Site boundary would be visible, particularly in the western and southern parts of the Study Area.
 - Theoretical visibility of the solar PV infrastructure within the Site boundary becomes more fragmented beyond 2km from the Site boundary when taking into account built features and vegetation.
 - The built-up areas in local towns and villages would screen views of the solar PV within the Site boundary, particularly along the coastline and in the northern parts of the Study Area.
- 11.4.6. With reference to **Figures 11.3 and 11.4** (See **Appendix E**), which model the zone of theoretical visibility of the substation within the Site boundary as shown on the Indicative Masterplan (see **Appendix D**):

²⁵⁴ Landscape Institute and IEMA (2013), Guidelines for Landscape and Visual Impact Assessment, Third Edition

- There would be greater theoretical visibility of the substation within the Site compared to the solar PV.
- There are no notable landform elements that would screen views towards the substation within the Site boundary and the subtle changes in landform would have minimal influence over its extent of visibility due to its increased height.
- Existing vegetation would obscure views of the substation within the Site boundary beyond 2km albeit to a lesser extent than the solar PV.
- The nearby towns and villages would serve to screen the substation within the Site boundary in views from the coast and further north.

11.4.7. Overall, the ZTVs demonstrates that areas where the Proposed Development would be more visible are from open farmland in the immediate vicinity of the Site boundary and up to 2km. On the other hand, areas of where the Proposed Development would less visible are found beyond 2km where intervening built form and vegetation obscure clear views, as well as within the towns and villages.

11.4.8. GLVIA3 sets out that at the scoping stage the study area may change as more detailed analysis is undertaken, discussion with the host authorities is progressed, and the design of the Proposed Development is developed. At this stage, taking account of the landscape characteristics and likely viewing opportunities of the Proposed Development, the LVIA Study Area is proposed to be a 2km radius from the Site boundary as shown on **Figure 11.1 within Appendix E**. This Study Area has been selected on the basis that there are not considered to be any likely significant effects on landscape and visual receptors beyond this distance. This is also considered to be the case in the event that the option of overhead cables is taken forward as the chosen method of exporting the electricity from the Site boundary to the substation given the concentration of existing pylons and overhead cables and their influence on the landscape and visual baseline in this part of the Study Area.

11.4.9. The extent of the LVIA study area would be reviewed throughout the iterative design process, informed by ongoing desk-based research and field-based analysis during winter and summer conditions. The extent of the LVIA study area would be consulted upon with the host authorities and the justification for its final extent provided in the ES.

Approach to the Collection of Baseline Data for Scoping

11.4.10. For the purposes of the Scoping Report, landscape and visual baseline conditions have been established through a desk-based review of published information, including the following sources of data:

- National Character Areas²⁵⁵;

²⁵⁵ Natural England, National Character Area Profiles, available at: <https://nationalcharacterareas.co.uk/>

- The Landscape Assessment of Kent²⁵⁶;
- Seascape Character Assessment for the Dover Strait²⁵⁷;
- Romney Marsh Local Landscape Character Assessment²⁵⁸;
- Ordnance Survey maps and aerial imagery;
- Public Right of Way Map for Kent County²⁵⁹;
- MAGIC environmental mapping²⁶⁰; and
- Campaign for the Protection of Rural England tranquillity²⁶¹ and night sky mapping²⁶².

11.4.11. An initial site walkover was undertaken in August 2025 and has informed this Scoping Report.

Relevant Baseline Conditions for Scoping

11.4.12. This section provides an overview of the existing baseline in terms of landscape character and visual amenity across the Study Area.

Landform and Hydrology

11.4.13. The Study Area lies within the extensive low-lying coastal plain of Romney Marsh, shaped by shingle deposition, marine inundation, and subsequent drainage. The landform is characteristically flat and open, defined by long horizons and expansive skies, with only subtle undulations created by historic sea walls and drainage features. Hydrology patterns are defined by a network of drainage ditches, watercourses, and sluices that regulate water levels. The Study Area is also influenced by its proximity to the Dungeness shingle foreland and the coastal edge, with groundwater levels sensitive to both tidal processes and artificial drainage.

²⁵⁶ Jacobs Babbie on behalf of Kent County Council (2004), The Landscape Assessment of Kent, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0010/182368/Landscape-Assessment-of-Kent.pdf

²⁵⁷ LUC on behalf of Kent County Council (2015), Seascape Character Assessment for the Dover Strait, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0018/48240/Dover-Strait-seascape-character-assessment-full-version.pdf

²⁵⁸ Fiona Fyfe Associates on behalf of The Fifth Continent Landscape Partnership and Shepway District Council (2016), Romney Marsh Landscape Character Assessment, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/2230/914-romney-marsh-local-character-assessment>

²⁵⁹ Kent County Council (2017), Public Rights of Way Map, available at: <https://webapps.kent.gov.uk/countrysideaccesscams/standardmap.aspx>

²⁶⁰ Natural England, MAGIC interactive mapping, available at: <https://magic.defra.gov.uk/>

²⁶¹ CPRE (2007), Tranquillity Map: England, available at: https://www.cpre.org.uk/wp-content/uploads/2019/11/tranquillity_map_england_regional_boundaries_1.pdf

²⁶² CPRE (2016), England's Light Pollution and Dark Skies interactive mapping, available at: <https://www.cpre.org.uk/light-pollution-dark-skies-map/>

- 11.4.14. More information relating to Hydrology can be found in Chapter 7: Hydrology, of the Scoping Report.

Land Use, Infrastructure and Settlement

- 11.4.15. Land use is dominated by intensive arable agriculture. Some grazing marsh survives in wetter pockets, particularly closer to Walland Marsh. Settlement is dispersed and rural in character, with the historic market town of Lydd and the linear coastal settlements of Greatstone-on-Sea and Lydd-on-Sea forming the more substantial built-up areas.
- 11.4.16. Transport routes such as the A259, Romney Road, Dungeness Road and Jurys Gap Road traverse the marsh on historic embanked causeways, often raised above surrounding fields. The Romney, Hythe and Dymchurch Railway provides a distinctive cultural and recreational use.
- 11.4.17. Industrial development is present within the Study Area, predominantly at Dungeness. This includes Lydd Airport as well as Dungeness A and B nuclear power stations which form prominent features in the landscape. Pylons, overhead power lines, substations, and existing renewable energy schemes, such as the Little Cheyne Court wind farm and Sycamore solar farm, also contribute to the evolving energy landscape.
- 11.4.18. The Lydd military firing ranges also exert an influence on the landscape and are discernible by the security fencing and the associated activity beyond.

Vegetation Patterns

- 11.4.19. Vegetation within the Study Area is typical of the marshland setting. Agricultural fields are bounded predominantly by drainage ditches, fringed by reeds and occasional clipped hedgerows. Tree cover is sparse, usually limited to pollarded willows, occasional shelterbelts, or groups around settlements and farmsteads. Scrub and rough grassland occur in less intensively farmed areas, while the Dungeness shingle habitats to the south support highly distinctive vegetation of international importance including rare lichens and flowering plants. This mosaic of sparse and linear vegetation contributes to the open character of the landscape.

Public Rights of Way

- 11.4.20. Public Rights of Way (PRoW) are distributed throughout the Study Area including the King Charles III England Coast Path, which provide recreational access and connectivity between settlements and the coast. The following PRoW routes intersect or cross the Site boundary (as presented in **Figure 16.3 within Appendix E**):
- South Brooks A:
 - Route 2 of the National Cycle Network lies along the eastern boundary and crosses through the east section of this part of the Site boundary;

- Bridleway HM 117 crosses east to west;
 - Bridleway HM 27 crosses north to south;
 - Bridleway HM 21 lies along the southern boundary;
 - Footpath HM 115 crosses to the north;
 - Footpath HM 4 crosses to the west; and
 - Footpath HM 5 crosses to the west.
- South Brooks B:
 - Footpath HL 1 crosses east to west.
- South Brooks C:
 - Bridleway HR 11 lies along the eastern boundary.
- South Brooks D:
 - Footpath HL 5 crosses east to west.
- South Brooks E:
 - Footpath HL 17 crosses east to west.
- South Brooks F:
 - No PRoW cross this part of the Site boundary.

Perceptual Qualities

- 11.4.21. The tranquillity of the Study Area is influenced by the expanse of marshes along the coast of the Dover Strait, together with tall energy infrastructure, and the distant hills of the Kent Downs and High Weald.
- 11.4.22. The presence of open landscapes, coastal marshes, and vegetated shingle contribute to the scenic quality of the Study Area. Away from infrastructure such as Dungeness Power Station and main roads, the landscape of the Study Area is also perceived as peaceful, sparsely populated, with low levels of recreational and commercial activity. With reference to the Campaign to Protect Rural England (CPRE) Light Pollution and Dark Skies mapping, the Study Area exhibits minimal light pollution away from the settlements and power station, supporting the perception of remoteness and naturalness.
- 11.4.23. The presence of wind turbines, pylons, substations, and the power station introduce visual and auditory disturbance. Localised traffic along Dungeness Road and Jurys Gap Road contributes to intermittent noise intrusion, whilst operational noise and visual prominence of energy infrastructure detract from the perception of peace in certain areas.

Landscape Designations

- 11.4.24. Neither the Site boundary nor the Study Area are covered by any statutory landscape designations (i.e. National Parks and National Landscapes).

- 11.4.25. The Site boundary is however located within the Romney Marsh Local Landscape Area (LLA). LLAs are identified within the Places and Policies Local Plan²⁶³, and are defined as ‘areas which are of particular local landscape value and/or act as green buffers within or adjoining urban areas, contributing to local environmental quality and identity’.
- 11.4.26. The eastern and southern parts of the Study Area are also designated as part of the Old Romney Shoreline and Dungeness Special Landscape Areas in the Places and Policies Local Plan, which highlights these two distinct areas as being of county-wide landscape significance for their natural beauty.

Other designations relevant to landscape

- 11.4.27. Other relevant designations within the Study Area (and are presented in **Figures 2.2 -2.7 within Appendix E**) that may indicate landscape value include:
- Ramsar – Dungeness, Romney Marsh and Rye Bay;
 - Special Protection Area – Dungeness, Romney Marsh and Rye Bay;
 - Site of Special Scientific Interest – Dungeness, Romney Marsh and Rye Bay;
 - Special Area of Conservation – Dungeness;
 - National Nature Reserve – Dungeness;
 - Scheduled Monument – Hope All Saints’, remains of church;
 - Scheduled Monument – Part of a Cistercian grange, north of New Romney High Street, also known as Romney Priory;
 - Scheduled Monument – Phoenix Caisson off Littlestone-on-Sea;
 - Scheduled Monument – Three acoustic early warning devices 2,360m east of Jack's Court;
 - Scheduled Monument – Lade Fort;
 - Scheduled Monument – Abandoned Medieval Church and Graveyard, Midley;
 - Scheduled Monument – Wooden Wreck on Camber Sands;
 - Conservation Area – Dungeness;
 - Conservation Area – Littlestone-on-Sea;
 - Conservation Area – Lydd;
 - Conservation Area – New Romney; and
 - Conservation Area – Old Romney.

²⁶³ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

11.4.28. Further detail relating to these designations is provided within **Chapter 6: Biodiversity**, **Chapter 9: Archaeology**, and **Chapter 10: Built Heritage**.

Important Receptors Identified

Landscape

11.4.29. Landscape receptors have been identified via a review of published landscape character assessments, maps and aerial photography, relevant planning policy and fieldwork surveys.

11.4.30. The Study Area and the Site boundary are covered by several Landscape Character Assessments and related studies, as set out below together with the relevant character areas:

- National Character Areas²⁶⁴:
 - 123: Romney Marshes.
- The Landscape Assessment of Kent²⁶⁵:
 - Brookland Farms;
 - Dungeness Shingle;
 - Romney Marsh Mixed Farmlands;
 - Romney Marsh Settlements;
 - The Romney Coast; and
 - Walland Marsh Farmlands.
- Seascape Character Assessment for the Dover Strait²⁶⁶:
 - C4A – Romney Coast, Hythe Flats & Roar Bank; and
 - C8A – Dungeness, Denge Marsh & Eastern Rye Bay.
- Romney Marsh Local Landscape Character Assessment²⁶⁷:
 - 1. Romney Marsh Proper Farmlands;
 - 2. Brookland Farmlands;
 - 3. Walland Marsh Farmlands;
 - 6. Dungeness Shingle;
 - 7. Romney Marsh Coast; and

²⁶⁴ Natural England, National Character Area 123: Romney Marshes, available at: <https://nationalcharacterareas.co.uk/romney-marshes/>

²⁶⁵ Jacobs Babbie on behalf of Kent County Council (2004), The Landscape Assessment of Kent

²⁶⁶ LUC on behalf of Kent County Council (2015), Seascape Character Assessment for the Dover Strait

²⁶⁷ Fiona Fyfe Associates on behalf of the Fifth Continent Landscape Partnership and Shepway District Council (2016), Romney Marsh Landscape Character Assessment

– 8. Camber Coast.

- 11.4.31. To provide a finer scale of assessment than what is provided in the published character studies in relation to the local towns and villages, Local Townscape Character Areas (LTCA) would also be defined by the Applicant via desk study and fieldwork surveys in line with industry guidance, namely An Approach to Landscape Character Assessment²⁶⁸. Maps and details of the LTCAs would be issued to the host authorities for comment and would be confirmed prior to preparation of the Environmental Statement (ES).
- 11.4.32. The landscape effects of the Proposed Development would also be reported at Site level with regard to the landscape character across the Site boundary. Individual features specifically trees, hedgerows, and watercourses within the Site boundary would also be assessed in terms of their landscape resource.

Visual Amenity

- 11.4.33. A range of visual receptors and representative viewpoints likely to experience views of the Proposed Development would be identified using the ZTV mapping and further field work. The number and distribution of these would be agreed through consultation with the host authorities but are likely to include:
- People living in Old Romney, New Romney, Greatstone-on-Sea, Lydd, and Camber as well as people living in dispersed properties beyond the settlements;
 - People using the King Charles III England Coast Path, Route 2 of the National Cycle Network, and local public rights of way;
 - People travelling on the B2075 and the local road network;
 - People travelling along Romney, Hythe, Dymchurch Railway; and
 - Visitors to the Sound Mirrors, west of Greatstone-on-Sea.
- 11.4.34. Photographs taken during fieldwork surveys would be provided and reported upon in the ES to help demonstrate the nature of baseline views including the extent of existing screening. These photographs would be presented as annotated photographs (Type 1 as per LI TGN 06/19).
- 11.4.35. Photomontages (Type 4 as per LI TGN 06/19) would also be provided from a selection of viewpoints to illustrate the likely extent and nature of changes in baseline views in winter and summer. All photographs and photomontages would be prepared in accordance with Landscape Institute TGN 06/19²⁶⁹.

²⁶⁸ Natural England (2014), An Approach to Landscape Character Assessment

²⁶⁹ Landscape Institute (2019), Technical Guidance Note 06/19: Visual Representation of Development Proposals

11.5. Environmental Measures

- 11.5.1. The LVIA would inform the iterative design process of the Proposed Development. Embedded design measures would be included to reduce and, where achievable, avoid significant adverse effects. Such mitigation would include the sensitive siting of solar panels and associated structures in response to the prevailing landscape pattern and existing views experienced by sensitive receptors. New planting would be proposed to complement and enhance the existing green infrastructure network and would also be designed to reduce visibility of the proposed above ground elements.
- 11.5.2. Consideration would be given to the opportunity to introduce environmental measures (and mitigation) that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with paragraph 7 of Schedule 4 of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects.
- 11.5.3. Specific environmental measures relevant to the Landscape and Visual topic would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development).
- 11.5.4. At this stage of the project, the following environmental measures are proposed to be included within the Proposed Development:
- Existing trees and hedgerows would be retained as far as possible and protected in accordance with best practice (BS 5837), and no Solar PV Array would be located within the following buffer zones:
 - Hedgerows: 5m
 - Watercourses, drainage ditches and waterbodies: 10m
 - Trees and woodlands: 15m
 - The substation compound would not be permanently lit, but rather lighting would be used when access or exit is required during hours of darkness, designed in accordance with Health and Safety requirements. External lighting would be mounted on columns up to 10 metres high. Task-specific lighting would be used in the case of emergency works. Passive Infra-Red controlled lighting would be used where access is required outside of working hours;
 - CCTV towers would be installed within the Proposed Development up to a maximum height of 5m above ground level. CCTV lighting would be infrared (not visible in the dark) and would not be permanently operated. CCTV lighting would be directed within the Site boundary, incorporating measures to minimise light spill beyond the areas required to be lit; and
 - The existing alignment of PRoW would be retained where practicable as part of the design of the Proposed Development. Temporary closure, diversion, or

managed crossings may be required during construction and decommissioning.

- 11.5.5. A suite of management plans would be prepared and submitted with the ES. These would incorporate the measures embedded within the Proposed Development as well as further mitigation as appropriate and identified through the environmental impact assessment process.

11.6. Scope of the Assessment

Consultation Undertaken to Date

- 11.6.1. To date, a series of introductory meetings have been held with various interested parties including the host authorities. A summary of these meetings is provided at **Chapter 5: Approach to EIA** of the EIA Scoping Report but have generally focussed on high-level information about the Proposed Development.
- 11.6.2. Following the receipt of the EIA Scoping Opinion and as the Proposed Development progresses, the Applicant would seek agreement from the relevant interested parties with regard to the approach and scope of the Landscape and Visual Impact Assessment. This is likely to constitute a series of virtual meetings, accompanied site visits, and email correspondence, all of which would be summarised by key issues and outcomes within the ES.

Likely Significant Effects Scoped Out from Detailed Assessment

- 11.6.3. Table 11.1 presents the Landscape and Visual matters that are unlikely to give rise to significant adverse effects and, therefore, which are proposed to be scoped out from detailed assessment.

Table 11.1 Likely Significant Landscape and Visual Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Changes to Special Qualities of Kent Downs National Landscape	The Kent Downs National Landscape is located approximately 8km from Site boundary at its closest point. The intervening area comprises a network of rural lanes and drainage ditches scattered with built form and infrequent tree cover, which restricts viewing opportunities of the Site boundary. Where visible from the Kent Downs National Landscape, the Proposed Development would be perceived as very small elements in the far distance and in context with other nearby energy infrastructure such that it would be barely perceptible. Therefore, the Proposed Development is not likely to give rise to significant effects on its Special Qualities.

Changes to Special Qualities of High Weald National Landscape

The High Weald National Landscape is located approximately 5.5km from Site boundary at its closest point. The intervening area comprises a network of rural lanes and drainage ditches scattered with built form and infrequent tree cover, which restricts viewing opportunities of the Site boundary.

Where visible from the High Weald National Landscape, the Proposed Development would be perceived as very small elements in the far distance and in context with other nearby energy infrastructure such that it would be barely perceptible. Therefore, the Proposed Development is not likely to give rise to significant effects on its Special Qualities.

Changes to character of National Character Areas

The geographical extent of National Character Areas are generally large and extend beyond the Study Area. As explained in paragraph 5.14 of GLVIA3, “broad-scale assessments at national or regional level can be helpful in setting the landscape context, but are unlikely to be helpful on their own as the basis for LVIA”. LCAs defined at the national scale would therefore be included to provide context, but effects on these receptors would not be assessed in the ES.

Lighting during construction and decommissioning

Task-specific lighting would be used during construction and decommissioning to enable works within parts of the Site boundary and works during hours of darkness within the agreed typical working hours.

Construction and decommissioning lighting is therefore not considered to have potential to give rise to significant landscape or visual effects because of its temporary and specific nature. It is therefore proposed that a standalone lighting assessment is scoped out. The impact of temporary and occasional lighting as detailed above would be considered as part of the wider landscape assessment of impacts on landscape character and visual amenity.

Lighting during operation

With reference to the commitments register (See **Appendix B**), the substation compound would not be permanently lit, but rather lighting would be used when access or exit is required during hours

of darkness, designed in accordance with Health and Safety requirements. External lighting would be mounted on columns up to 10 metres high. Task-specific lighting would be used in the case of emergency works. Passive Infra-Red controlled lighting would be used where access is required outside of working hours. Where internal lighting is used within control buildings, light spillage would be controlled. CCTV installed along the perimeter of the Solar PV area would not require visible lighting.

As such lighting is not considered to have the potential to give rise to significant landscape or visual effects. It is therefore proposed that a standalone lighting assessment is scoped out. The impact of the temporary and occasional lighting detailed in the commitments register would be considered as part of the wider assessment of impacts on landscape character and visual amenity.

Changes to views and visual amenity of people at their place of work

This receptor group is acknowledged in GLVIA3 as being less sensitive to change in views and visual amenity such that for them to experience significant effects would require a high magnitude of change.

No people at their place of work have been identified within or immediately adjacent to the Site boundary, and where they may be present in other locations within the Study Area, their baseline views and visual amenity are heavily influenced by energy infrastructure. Therefore, the Proposed Development is not likely to give rise to significant visual effects.

Changes to views and visual amenity of people engaged in outdoor sport or recreation which does not depend upon the appreciation of views of the landscape

This receptor group is acknowledged in GLVIA3 as being less sensitive to change in views and visual amenity such that for them to experience significant effects would require a high magnitude of change.

No people engaged in outdoor sport or recreation which do not depend upon the appreciation of views of the landscape have been identified within or immediately adjacent to the Site boundary, and where they may be present in other locations within the Study Area, their baseline views and visual amenity are heavily influenced by energy infrastructure. Therefore, the Proposed

Development is not likely to give rise to significant visual effects.

Likely Significant Effects Scoped Into the Detailed Assessment

- 11.6.4. The Proposed Development has the potential to result in temporary significant adverse landscape and visual effects during the construction phase. There are likely to be significant changes to the landscape character as well as views and visual amenity due to alterations to surface landform and vegetation, the presence and movement of construction machinery, introduction of construction compounds and access routes, and associated reduction in tranquillity.
- 11.6.5. Throughout operation, significant adverse landscape and visual effects are also likely. This is due to the changes to the landscape character as well as views and visual amenity resulting from the change in land use through the introduction of solar panels and associated structures. Although most of the impacts would be reversible, they would be long term. The Proposed Development would include areas of new planting, likely to include diverse grassland and meadows, trees and hedgerows. Once established, this new planting has the potential to result in a reduction of the level of landscape and visual effects.
- 11.6.6. The decommissioning phase has the potential to result in significant adverse landscape and visual effects, similar to but of no greater magnitude than the construction phase.
- 11.6.7. Table 11.2 presents the landscape matters that are likely to give rise to significant adverse effects as a result of the Proposed Development and, therefore, which are proposed to be scoped into the detailed assessment.

Table 11.2 Likely Significant Landscape Effects to be Scoped In

Potential Effect	Receptor
Changes to Regional Landscape Character	Brookland Farms Dungeness Shingle Romney Marsh Mixed Farmlands Romney Marsh Settlements The Romney Coast Walland Marsh Farmlands
Changes to Regional Seascape Character	C4A – Romney Coast, Hythe Flats & Roar Bank C8A – Dungeness, Denge Marsh & Eastern Rye Bay
Changes to District Landscape Character	1. Romney Marsh Proper Farmlands 2. Brookland Farmlands 3. Walland Marsh Farmlands 6. Dungeness Shingle 7. Romney Marsh Coast 8. Camber Coast

Changes to Local Townscape Character	Local Townscape Character Areas
Changes to Site Landscape Character	Landscape character of the Site boundary
Changes to Landscape Features	Trees, hedgerows, and watercourses within the Site boundary

11.6.8. Table 11.3 presents the visual matters that are likely to give rise to significant adverse effects and, therefore, which are proposed to be scoped into the detailed assessment.

Table 11.3 Likely Significant Visual Effects to be Scoped In

Potential Effect	Receptor
Changes to views and visual amenity of residents	People living in Old Romney, New Romney, Greatstone-on-Sea, Lydd, and Camber as well as people living in dispersed properties beyond the settlements
Changes to views and visual amenity of people engaged in recreation which depends upon the appreciation of views of the landscape	People using the King Charles III England Coast Path, Route 2 of the National Cycle Network, and local public rights of way
Changes to views and visual amenity of motorists	People travelling on the B2075 and the local road network
Changes to views and visual amenity of rail passengers	People travelling along Romney, Hythe, Dymchurch Railway
Visitors to heritage assets where views are an important contributor to experience	Visitors to the Sound Mirrors, west of Greatstone-on-Sea

11.7. Proposed Approach to the ES

Consultation

- 11.7.1. With regards to the Landscape and Visual Chapter, it is expected that a series of meetings would be convened with the host authorities and other key stakeholders as appropriate to agree the assessment methodology as well as scope of landscape and visual receptors and representative viewpoints noting that the scope is likely to evolve as the design progresses. The consultation is likely to be in the form of on-site meetings and virtual presentations, as well as ad hoc telephone and email correspondence.
- 11.7.2. Should it become apparent, through the on-going design and assessment process, that the potential for significant adverse landscape or visual effects on a receptor changes, the receptor would be scoped in/out of the assessment,

with accompanying justification and through consultation with the relevant host authorities and landscape consultees.

Assessment Methodology

- 11.7.3. The LVIA would be undertaken in accordance with the following best practice guidance which applies to proposed development in the UK:
- Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3)²⁷⁰;
 - Notes and Clarifications on GLVIA3²⁷¹;
 - Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations²⁷²;
 - Technical Guidance Note 06/19: Visual Representation of Development Proposals²⁷³;
 - An Approach to Landscape Character Assessment²⁷⁴;
 - Technical Guidance Note 04/2020: Infrastructure²⁷⁵;
 - Technical Information Note 01/2017: Tranquillity²⁷⁶; and
 - Technical Guidance Note 02/19: Residential Visual Amenity Assessment (RVAA)²⁷⁷.

Further Baseline Data

- 11.7.4. Further fieldwork would be undertaken in winter and summer conditions throughout the design and assessment process. The fieldwork would be informed by refined Zones of Theoretical Visibility (ZTV) mapping, which would reflect emerging design refinements. The additional baseline work would also inform the classification of the Local Townscape Areas to be defined by the Applicant. Photography would be captured from each representative viewpoint in both summer and winter conditions, showing the effect of seasonality on the potential visibility of the Proposed Development.

²⁷⁰ Landscape Institute and IEMA (2013), Guidelines for Landscape and Visual Impact Assessment, Third Edition

²⁷¹ Landscape Institute (2024), Technical Guidance Note LITGN-2024-01: Notes and Clarification on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)

²⁷² Landscape Institute (2021), Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations

²⁷³ Landscape Institute (2019), Technical Guidance Note 06/19: Visual Representation of Development Proposals

²⁷⁴ Natural England (2014), An Approach to Landscape Character Assessment

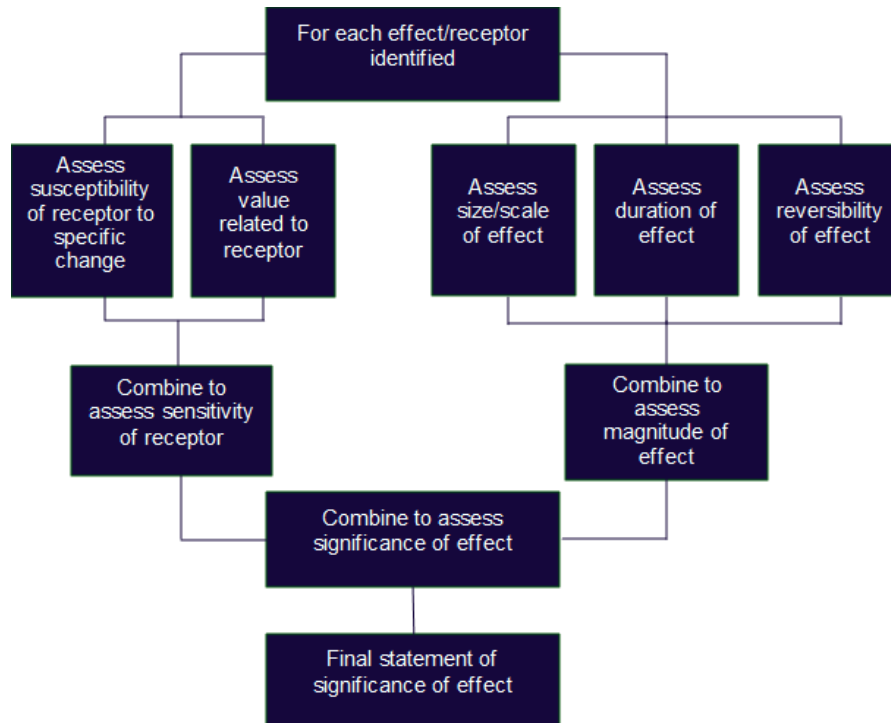
²⁷⁵ Landscape Institute (2020), Technical Guidance Note 04/2020: Infrastructure

²⁷⁶ Landscape Institute (2017), Technical Information Note 01/2017: Tranquillity.

²⁷⁷ Landscape Institute (2019), Technical Guidance Note 02/19: Residential Visual Amenity Assessment (RVAA).

Construction, Operation, and Decommissioning

11.7.5. The methodology would reflect the process set out in Figure 3.5 of GLVIA3 as shown below:



Overview of LVIA Methodology

11.7.6. In accordance with the GLVIA 3 process, the LVIA methodology would include the following key stages:

- A baseline review of published landscape assessments, studies, relevant supporting evidence base documents, aerial photography, mapping and fieldwork to identify the landscape and visual baseline and receptors. These shall be presented to the host authorities to seek their agreement on the scope of the LVIA, including the extent of the Study Area;
- An assessment of the sensitivity of landscape and visual receptors, based on an assessment of their respective value and susceptibility to change, and taking into account the local landscape designations and other indicators of landscape sensitivity;
- An assessment of the magnitude of impact resulting from the Proposed Development during construction, Year 1, Year 15 (to determine the likely significant effects of landscaping, taking account of vegetation maturity), and decommissioning. The assessment of magnitude of impact would consider the scale, duration, and reversibility of the impact. Short-term durations are considered to be two years or less; medium-term durations are considered to be between two and five years; and long-term durations are considered to be more than five years;

- The assessment would then combine the receptor's sensitivity and the magnitude of impact experienced at each assessment scenario to determine the resultant level of effect and effectiveness of the landscape mitigation;
- An assessment of the significance of the effect on the landscape and visual receptors identified i.e. is the effect considered significant in EIA terms. It is proposed that effects judged to be moderate and major would be considered to be significant;
- The LVIA would review the Glint and Glare Assessment to include consideration of how glint and/or glare impacts might contribute to landscape or visual effects; and
- The LVIA would assess the potential visual effects on different types of visual receptor, including residential receptors, i.e. private views (albeit assessed from publicly accessible locations). In the event that the visual assessment identifies major adverse effects on residents at year 15 of operation (i.e. major adverse visual effects remaining after the establishment of landscape mitigation), a Residential Visual Amenity Assessment would be undertaken in line with the Landscape Institute's Technical Guidance Note 02/19: Residential Visual Amenity Assessment²⁷⁸.

Cumulative Effects

- 11.7.7. **Chapter 5: Approach to EIA** sets out the general approach to assessing the significance of cumulative effects, which would be followed in the preparation of the Landscape and Visual assessment.

Assumptions and Limitations

- 11.7.8. All fieldwork would be undertaken from publicly accessible locations. Professional judgement would be used to assess residents' views, aided by aerial photography and fieldwork observations.
- 11.7.9. For the construction phase assessment, a reasonable worst-case approach would be undertaken, which assumes that construction activity would occur in winter and would be undertaken across the Site boundary at the same time.
- 11.7.10. For the Year 1 operational assessment, the assumption is that the Proposed Development would be operational in winter conditions. This represents a reasonable worst-case assessment. The Year 15 assessment would assume summer conditions and the establishment of planting included in the landscape design. This represents an assessment of the completed and operational development.

²⁷⁸ Landscape Institute (2019), Technical Guidance Note 02/19: Residential Visual Amenity Assessment (RVAA).

- 11.7.11. For the decommissioning assessment, the assumptions are that the Proposed Development is no longer operational, and the solar panels and associated structures and equipment are being removed in a manner similar to the construction phase requiring machinery and localised activity in winter.
- 11.7.12. Design work on the layout and heights of the individual components within the Proposed Development is still on-going this stage and therefore the Study Area would be kept under review as more details relating to these aspects are fixed.

12. Transport and Access

12.1. Introduction

- 12.1.1. This Chapter of the Scoping Report presents the scope of the detailed environmental assessment for Transport and Access matters for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It concludes by setting out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment, and concludes by outlining the method that would be used to undertake the detailed environmental assessment.

12.2. Review of Policy, Legislation, and Relevant Guidance

- 12.2.1. Legislation, planning policy and guidance relating to transport matters and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises of the following:

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)²⁷⁹ in particular paragraphs 5.14.1 – 5.14.22 that describe the requirements for assessing and providing mitigation to offset potential impacts associated with construction and operational traffic created by new energy projects;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)²⁸⁰; and
- National Planning Policy Framework (NPPF) (updated February 2025)²⁸¹, in particular Section 9.

Local Planning Policy

²⁷⁹ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

²⁸⁰ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

²⁸¹ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)²⁸²;
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)²⁸³;
- Kent County Council Local Transport Plan 5: Striking the Balance²⁸⁴;
- East Sussex County Council Local Transport Plan 4²⁸⁵.

National Guidance

- Design Manual for Roads & Bridges (DMRB)²⁸⁶;
- Planning Practice Guidance “Travel Plans, Transport Assessments and Statements”²⁸⁷;
- Institute of Environmental Assessment (IEA), The Guidelines for the Environmental Assessment of Road Traffic (1993)²⁸⁸; and
- Institute of Sustainability and Environmental Professionals (formally the Institute of Environmental Management and Assessment) Environmental Assessment of Traffic and Movement (2023)²⁸⁹.

Local Guidance

- Kent County Council Transport Assessment and Travel Plan Guidance²⁹⁰;

²⁸² Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at:

<https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

²⁸³ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

²⁸⁴ Kent County Council (2025), Local Transport Plan 5: Striking the Balance available at <https://www.kent.gov.uk/about-the-council/strategies-and-policies/service-specific-policies/roads-paths-and-transport-policies/striking-the-balance-our-local-transport-plan>

²⁸⁵ East Sussex County Council (2024), Local Transport Plan 4, available at

<https://www.eastsussex.gov.uk/roads-transport/transport-planning/local-transport-plan>

²⁸⁶ Department for Transport, et al, Design Manual for Roads and Bridges, available at <https://www.standardsforhighways.co.uk/dmr>

²⁸⁷ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) and Department for Levelling Up, Housing and Communities (2014), Travel Plans, Transport Assessments and Statements, available at <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

²⁸⁸ Institute of Environmental Assessment (1993), The Guidelines for the Environmental Assessment of Road Traffic

²⁸⁹ Institute of Sustainability and Environmental Professionals (formally the Institute of Environmental Management and Assessment) (2023), Environmental Assessment of Traffic and Movement available at <https://www.iema.net/media/5mrmquib/iema-report-environmental-assessment-of-traffic-and-movement-rev07-july-2023.pdf>

²⁹⁰ Kent County Council (2025), Transport Assessment and Travel Plan Guidance available at https://www.kent.gov.uk/_data/assets/pdf_file/0018/216180/Transport-assessment-and-travel-plan-guidance.pdf

- East Sussex County Council Transport Assessment, Transport Statements and Transport Reports: Guidance of Development Proposals in East Sussex²⁹¹;
- East Sussex County Council Guidance on Travel Plans for New Development²⁹²;
- East Sussex County Council Highway Construction Specification for Developers²⁹³;

12.3. Existing Baseline Conditions

- 12.3.1. This section of the Scoping Chapter for Transport and Access matters sets out the known baseline conditions at this (scoping) stage of the Proposed Development. It is noted that further surveys and assessment are proposed to inform the technical assessment for the Environmental Statement (ES).

12.4. Study Area

- 12.4.1. A review of the Proposed Development land parcels has been undertaken to consider which roads would be potentially affected by construction traffic. This review was informed by the use of Ordinance Survey (OS) and other mapping sources.
- 12.4.2. The Study Area is based upon the proposed routes that have been identified for construction material deliveries to and within the Site boundary, and would include the following road links:
- A259 between Rye and Brenzett;
 - A259 between Brenzett and New Romney;
 - B2075 between its junction with the A259 and its junction with Harden Road, Lydd;
 - Harden Road between its junction with the B2075 and Dungeness Road, Lydd;
 - Dungeness Road, Lydd;
 - Manor Road, Lydd;
 - Dengemarsh Road, Lydd;
 - Tournay Road, Lydd;

²⁹¹ East Sussex County Council (2009), Transport Assessment, Transport Statements and Transport Reports: Guidance of Development Proposals in East Sussex, available at <https://www.eastsussex.gov.uk/planning/roads/planning-applications/guidance>

²⁹² East Sussex County Council (2020), Guidance on Travel Plans for New Development, available at <https://www.eastsussex.gov.uk/planning/roads/planning-applications/guidance>

²⁹³ East Sussex County Council (2020), Highway Construction Specification for Developers, available at <https://www.eastsussex.gov.uk/planning/roads/planning-applications/guidance>

- Jurys Gap Road, between Lydd and Camber;
- Swamp Road, Old Romney;
- Wheelsgate Lane, Old Romney; and
- Beggarsbush Lane, Old Romney.

12.4.3. The assessment would consider the effects on transport link users and residents within the Study Area during the construction phase only, as this represents the worst-case traffic scenario.

12.5. Approach to the Collection of Baseline Data for Scoping

12.5.1. Baseline data was collected using the following sources, as well as project specific surveys:

- Ordnance Survey (OS) Maps of the study area and surrounding road links;
- Department for Transport Strategic Road Network Plan²⁹⁴;
- Aerial photographs of study area roads;
- A Site boundary access review visit;
- The online accident data resource²⁹⁵; and
- Department for Transport (DfT) Road Traffic Database²⁹⁶.

12.5.2. Further baseline traffic data would be required from bespoke Automatic Traffic Count surveys as discussed in later sections of this chapter.

Relevant Baseline Conditions for Scoping

12.5.3. The development parcels located to the north and east of Lydd (South Brooks B, C and D) are potentially accessible from the B2075 corridor. This road provides distributor access to the town of Lydd, a settlement with a population of c.6,250 people.

12.5.4. During the Site boundary visit and through discussions with local residents at Phase One consultation, concerns have been raised in relation to road accidents at the junction of the B2075 / A259 junction. In the previous five year period (excluding 2020 and 2021 due to Covid restrictions), the online resource www.crashmap.co.uk noted that four accidents had occurred at this location, requiring further consideration in the wider assessment.

²⁹⁴ Department for Transport (2022) Guidance - Strategic road network and the delivery of sustainable development [Online] available at: <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

²⁹⁵ www.crashmap.co.uk

²⁹⁶ DfT (2024) Road Traffic in Great Britain [Online] available at: <https://roadtraffic.dft.gov.uk/>

- 12.5.5. Further accident reviews would be undertaken to identify any further areas of concern.
- 12.5.6. The road network leading from Old Romney is rural in nature and potential enhancements to enable safe and efficient construction access may be required to cater for construction traffic flows.
- 12.5.7. The A259 between Rye and Brenzett is a trunk road, adopted and operated by National Highways. The A259 has good linkages to the wider SRN via the A2070 to the M20 corridor.
- 12.5.8. It is the Applicant's wish to avoid as many construction traffic interactions with existing villages and towns as far as is possible to help reduce potential impacts and disturbance to local communities. As such, the Study Area may reduce should the access strategy be refined further.

Important Receptors Identified

- 12.5.9. The following receptors would be considered in the assessment of the construction phase:
- Users of the A259;
 - Users of the B2075;
 - Users of the local road network;
 - Residents of Lydd;
 - Residents of Brookland;
 - Residents of New Romney;
 - Residents living alongside the local road network;
 - Users of the Public Rights of Way (PRoW) bisecting access routes to the Site boundary and PRoW within the Site boundary development area.
- 12.5.10. These would be kept under review as the Proposed Development is developed further.

12.6. Environmental Measures

- 12.6.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or minimise the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the Environmental Impact Assessment (EIA) Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to transport and access matters would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this

stage of the Proposed Development, the following environmental measures would be implemented and included within the Proposed Development.

Construction

- 12.6.2. The following measures are likely to be implemented during the construction phase:
- Basic traffic management and road signage requirements;
 - Compliant access junction designs with appropriate consideration for all road users;
 - Temporary diversions of PRow; and
 - An Abnormal Indivisible Load (AIL) convoy plan.
- 12.6.3. Additional mitigation measures may be required and may include:
- A detailed Construction Traffic Management Plan (CTMP);
 - An AIL Route Survey and Transport Management Plan;
 - Outdoor Access Management Plan to assist and outline the management measures required for PRow and other paths affected by the Proposed Development; and
 - New and enhanced Permissive Paths and / or PRow within the Proposed Development limits.
- 12.6.4. The need for the enhanced measures would be informed by the traffic impact assessment results.

Operation

- 12.6.5. A section of the Operational Environmental Management Plan (OEMP) would set limits for operational phase traffic movements and would outline measures that would ensure compliance with these during normal operations. An outline Operational Environmental Management Plan (oOEMP) would be submitted in support of the Development Consent Order (DCO) Application.

Decommissioning

- 12.6.6. A Decommissioning Traffic Management Plan (DTMP) would outline the control mechanisms for decommissioning traffic in the future.

12.7. Scope of the Assessment

Consultation Undertaken to Date

- 12.7.1. There has been no formal transport consultation undertaken to date. Further information on consultation completed to date for the Proposed Development is detailed in Section 5.5 of **Chapter 5: Approach to EIA**.

Effects Scoped Out from Detailed Assessment

- 12.7.2. The operational phase of the Proposed Development would result in occasional traffic maintaining the solar arrays and BESS. The traffic associated with this phase (up to two van trips per day) would be insufficient to trigger the 30% threshold (see ISEP rules²⁸⁹) for assessment and as such, it is proposed that this phase can be scoped out of the assessment.
- 12.7.3. Where solar panels are in need of replacement, a limited number of traffic movements, no greater than 20 LGV trips and 12 HGV trips per day, would be permitted and strictly controlled by measures detailed in a proposed OEMP. This increase in traffic of no more than 32 movements per day has been accepted for other DCO solar schemes as being below the threshold for assessment and has been excluded from further assessment.
- 12.7.4. The decommissioning phase would result in fewer traffic movements than the construction phase as elements such as the improved junctions and some access tracks may be retained for future agricultural / land uses. Given that the decommissioning phase would be c.60 years on from the submission of the DCO, it would be impossible to ascertain the future baseline with any degree of certainty. As such, it is proposed to scope out the decommissioning phase.
- 12.7.5. It is however proposed that a commitment for a decommissioning Traffic Management Plan (DTMP) would be made within the submission to protect the future road authority from future road deterioration issues and to ensure the safe movement of all road users at that time. This would likely be secured by planning condition.

Likely Significant Effects Scoped into the Detailed Assessment

- 12.7.6. Construction traffic would include staff and material deliveries to and from the Proposed Development. The greatest concentration would occur at the Site boundary access junctions.
- 12.7.7. During the construction phase a peak of construction traffic would be generated. The assessment would quantify the peak level of construction traffic and the potential impact with regard to the effects noted below:
- Severance;
 - Driver delay;
 - Pedestrian delay;
 - Non-motorised user amenity;
 - Fear and intimidation;
 - Road safety;
 - Road Safety Audits; and

- Large loads.

12.7.8. In line with best practice, mitigation measures would be detailed where an effect is considered significant.

12.8. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 12.8.1. The collection of baseline data has been developed from the proposed access strategy for the Proposed Development.
- 12.8.2. The extent of the Study Area would be developed from the likely origin and destination points for construction staff and materials. The exact Site boundary access junction details have yet to be finalised, however the access strategy is based upon the need to avoid traffic causing unnecessary disruption and distress to sensitive receptors and communities.
- 12.8.3. Data for use in the assessment would include the following desk top sources:
- active travel data from OS mapping, Kent CC Public Rights of Way Map, East Sussex CC Public Rights of Way Map and the Sustrans National Cycle Network Route (NCNR) map;
 - the online accident statistics database²⁹⁵;
 - Department for Transport (DfT) traffic count data for the study area network;
 - traffic flows from nearby significant traffic generating developments that have planning determinations and that are in the public domain; and
 - aerial photography, OS mapping and other map data sources.
- 12.8.4. The baseline traffic survey information obtained from the DfT and new traffic surveys would be factored using National Road Traffic Forecast (NRTF) low growth assumptions to develop a future year baseline traffic flow for use in the assessment.
- 12.8.5. Further traffic flow information would be obtained from new Automatic Traffic Count (ATC) surveys undertaken at various locations within the Study Area, to help determine overall traffic flows in the area and at sensitive locations.

General Methodology

- 12.8.6. The assessment would be undertaken in accordance with the Institute of Sustainability and Environmental Professionals (ISEP) Environmental Assessment of Traffic and Movement (2023)²⁸⁹.

- 12.8.7. This guidance notes two rules to be used as a screening process to identify the appropriate extent of the assessment area and likelihood of effects. These are:
- Rule 1 - Include highway links where traffic flows would increase by more than 30% (or the number of heavy goods vehicles would increase by more than 30%); and
 - Rule 2 – Include highway links of high sensitivity where traffic flows have increased by 10% or more.
- 12.8.8. Where the predicted increase in traffic flow is lower than these thresholds, then the effect is considered insignificant and, as such, no further assessments are required.
- 12.8.9. Where construction traffic flows meet or exceed these thresholds, the significance of traffic and transport effects (including any cumulative development) would be determined by assessing the sensitivity of receptors against the magnitude of change to categorise significance as Major, Moderate, Minor or Negligible.
- 12.8.10. It is not anticipated that a formal Transport Assessment would be required as these are not generally considered necessary for temporary construction works. A construction project scope Transport Assessment is therefore proposed and would be submitted in support of the application.
- 12.8.11. Where large scale High Voltage (HV) component loads are required for the electrical grid connection, these would be delivered as Abnormal Indivisible Loads (AIL). Detailed swept path analyses would be undertaken for the main constraint points on the route from the nearest suitable trunk road junction through to the proposed substation access junction to demonstrate that components can be delivered to Site boundary and to identify any temporary road works which may be necessary. A Route Survey Report describing the route and the proposed operational management of the deliveries would be submitted in support of the application.
- 12.8.12. Cumulative assessment of traffic effects from nearby projects that are of a significant scale (and where traffic flows are publicly available) and have been determined would be undertaken. Projects that are in scoping or that do not have a planning determination would not be included in cumulative reviews due to the lack of confirmed traffic data available.
- 12.8.13. Where first or third party developments are required to enable the Proposed Development, then these would be assessed as Associated Development, again only where the proposed traffic flows are publicly available.
- 12.8.14. The Institute of Environmental Management and Assessment (IEMA) (now rebranded as the Institute of Sustainability and Environmental Professionals – ISEP) publication “Environmental Assessment of Traffic and Movement” (2023)²⁸⁹ would be used to characterise the environmental traffic and transport effects (off-Site boundary effects) and the assessment of significance of major

new developments. The guidelines intend to complement professional judgement and the experience of trained assessors.

- 12.8.15. In terms of traffic and transport effects, the receptors are the users of the roads and paths within the study area and the locations through which those transport links pass.
- 12.8.16. An assessment of the sensitivity of receptors would be undertaken in accordance with the criteria set out in the following summary tables (for users and for residents).

Table 12.1: Classification of Receptor Sensitivity (Road Users)

Sensitivity of Receptor	Criteria for Road Users
High	Where the road is a minor rural road, not constructed to accommodate frequent use by HGVs. Includes roads with traffic control signals, waiting and loading restrictions, traffic calming measures.
Medium	Where the road is a local A or B class road, capable of regular use by HGV traffic. Includes roads where there are some traffic calming or traffic management measures.
Low	Where the road is Trunk or A-class, constructed to accommodate significant HGV composition. Includes roads with little or no traffic calming or traffic management measures.
Negligible	Where roads have no adjacent settlements. Includes new strategic trunk roads that would be little affected by additional traffic and suitable for Abnormal Loads and new strategic trunk road junctions capable of accommodating Abnormal Loads.

Table 12.2: Classification of Receptor Sensitivity (Residents / Locations)

Sensitivity of Receptor	Criteria for Residents / Locations
High	Where a location is a large rural settlement containing a high number of community and public services and facilities.
Medium	Where a location is an intermediate sized rural settlement, containing some community or public facilities and services.

Low	Where a location is a small rural settlement, few community or public facilities or services.
Negligible	Where a location includes individual dwellings or scattered settlements with no facilities.

12.8.17. The ISEP Guidelines identify the key effects that are most important when assessing the magnitude of traffic impacts from an individual development. The effects and levels of magnitude are discussed below:

- Severance – the ISEP Guidance advises that, “The Department for Transport has historically set out a range of indicators for determining the significance of severance. Changes in traffic flow of 30%, 60% and 90% are regarded as producing ‘slight’, ‘moderate’ and ‘substantial’ changes in severance respectively. Although these thresholds no longer appear in Department for Transport guidance, they have not been superseded by subsequent changes to guidance and are established through planning case law. However, caution needs to be observed when applying these thresholds as very low baseline flows are unlikely to experience severance impacts even with high percentage changes in traffic.” (Para 3.16). The Guidelines acknowledge that changes in traffic flows should be used cautiously, stating that “the assessment of severance should pay full regard to specific local conditions, e.g. sensitivity of adjacent land uses, prevalence of vulnerable people, whether or not crossing facilities are provided, traffic signal settings, etc.” (Para 3.17).
- Driver delay – the ISEP Guidelines note that these delays are only likely to be “significant when the traffic on the network surrounding the development is already at, or close to, the capacity of the system” (Para 3.20).
- Pedestrian delay (incorporating delay to all non-motorised users) – the ISEP Guidance advises that “pedestrian delay and severance are closely related effects and can be grouped together. Changes in the volume, composition or speed of traffic may affect the ability of people to cross roads. In general, increases in traffic levels are likely to lead to greater increases in delay. Delays would also depend on the general level of pedestrian activity, visibility and general physical conditions of the development Site boundary.” (Para 3.24). Furthermore, the guidance advises that “...it is not considered wise to set down definitive thresholds. Instead, it is recommended that the competent traffic and movement expert use their judgement to determine whether pedestrian delay constitutes a significant effect.” (Para 3.26).
- Non-motorised user amenity – the ISEP Guidance advises that, “The 1993 Guidelines suggest that a tentative threshold for judging the significance of changes in pedestrian amenity would be where the traffic flow (or HGV component) is halved or doubled. Although these thresholds no longer appear in Department for Transport guidance, they have not been superseded by subsequent changes to guidance and are established through planning case law.” (Para 3.30).

- Fear and intimidation – there are no commonly agreed thresholds for estimating levels of fear and intimidation, from known traffic and physical conditions. However, as the impact is considered to be sensitive to traffic flow, changes in traffic flow of 30%, 60% and 90% are regarded as producing minor, moderate and substantial changes respectively in the guidelines. (Para 2.19). As such, this has been used to assess the potential impacts associated with construction activities around fear and intimidation on people in close proximity to the proposed development.
- Road safety – professional judgement would be used to assess the implications of local circumstances, or factors which may elevate or lessen risks of accidents. In line with the ISEP Guidance, those areas of collision clusters would be subject to detailed review.
- Road safety audits – it would be proposed to undertake any necessary Road Safety Audits (RSA) post consent, and it is considered that this can be secured via a DCO requirement.
- Large loads – the movement of the AILs associated with the construction of the Proposed Development would be considered in full, within a separate route survey assessment, which identifies physical mitigation measures required to accommodate the predicted loads. Additional mitigation in terms of addressing potential impacts on sensitive receptors would be included, where required.

- 12.8.18. While not specifically identified as more vulnerable road users, cyclists are considered in similar terms to pedestrians.
- 12.8.19. The significance of effects are determined using the following matrix. Any effects that are considered Major or Moderate are considered significant.

Table 12.3: Significance Criteria

Receptor Sensitivity	Magnitude of Change			
	High	Medium	Low	Negligible
High	Major	Major	Moderate	Minor
Medium	Major	Moderate	Minor	Negligible
Low	Moderate	Minor	Negligible	Negligible
Negligible	Minor	Negligible	Negligible	Negligible

- 12.8.20. Mitigation measures that are likely to be required where effects are judged to be significant (major or moderate) are likely to include:
- Production of a Construction Traffic Management Plan;
 - The design of suitable access arrangements with full consideration given to the road safety of all road users;
 - A Staff Sustainable Access Plan; and
 - A Framework Abnormal Load Transport Management Plan.
- 12.8.21. Additional mitigation would be included should the assessment reveal residual effects that are significant following the application of the proposed mitigation measures.
- 12.8.22. All mitigation measures would only be relevant to the construction phase of the Proposed Development.

Operation

- 12.8.23. It is proposed that operational and maintenance effects can be scoped out of the ES assessment and would be strictly controlled by an Operational Environmental Management Plan (OEMP). This would be secured in an outline OEMP submitted as part of the DCO.

Decommissioning

- 12.8.24. It is proposed that decommissioning effects can be scoped out of the assessment and would be strictly controlled by a Decommissioning Transport Management Plan (DTMP).

Assumptions and Limitations

- 12.8.25. The assessment of construction traffic would assume the use of standard construction techniques commensurate for the type of works being undertaken. The final techniques, plant selection and programme are expected to be determined by the appointed contractor, in consultation with relevant authorities prior to commencement of construction.

13. Carbon and Climate Change

13.1. Introduction

13.1.1. This chapter of the Scoping Report presents the scope of the detailed environmental impact assessment for Carbon and Climate Change for the Proposed Development. Specifically, this section of the Scoping Report presents for this topic the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It also sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and then concludes by outlining the method that would be used to undertake the detailed environmental assessment. The assessment with regards to climate comprises both the impacts of climate change on the Proposed Development, in the form of a climate change risk assessment, as well as the impact of the Proposed Development on the climate, in the form of a greenhouse gas (GHG) assessment.

13.1.2. This chapter should be read in conjunction with **Chapter 7: Hydrology**

13.2. Review of Policy, Legislation, and Relevant Guidance

13.2.1. Legislation, planning policy and guidance relating to Carbon and Climate Change and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

International Treaties

- The 2015 Paris Agreement²⁹⁷;
- United Nations Framework Convention on Climate Change 1994²⁹⁸; and
- Kyoto Protocol 1997²⁹⁹.

Legislation

- The Climate Change Act 2008 (as amended by the Climate Change Act (2050 Target Amendment Order 2019))³⁰⁰; The Carbon Budget Order 2009³⁰¹;
- The Carbon Budget Order 2011³⁰²;

²⁹⁷ The 2015 Paris Agreement, available at: <https://unfccc.int/process-and-meetings/the-paris-agreement>

²⁹⁸ United Nations Framework Convention on Climate Change 1994, available at: <https://unfccc.int/>

²⁹⁹ Kyoto Protocol 1997, available at: <https://unfccc.int/resource/docs/convkp/kpeng.pdf>

³⁰⁰ Climate Change Act 2008 (as amended by the Climate Change Act (2050 Target Amendment Order 2019)). Available online: <https://www.legislation.gov.uk/ukdsi/2019/9780111187654>

³⁰¹ The Carbon Budget Order 2009, available at: <https://www.legislation.gov.uk/uksi/2009/1259/made>

³⁰² The Carbon Budget Order 2011, available at: <https://www.legislation.gov.uk/uksi/2011/1603/made>

- The Carbon Budget Order 2016³⁰³;
- The Carbon Budget Order 2021³⁰⁴; and
- Energy Act 2023³⁰⁵.

National Planning Policy

- Overarching National Policy Statement for Energy (NPS EN-1) (2023) (designated January 2024)³⁰⁶;
- British Energy Security Strategy (Department for Business, Energy & Industrial Strategy, and Department for Energy Security & Net Zero, 2022)³⁰⁷;
- Energy White Paper: Powering our Net Zero Future (2020)³⁰⁸;
- Powering Up Britain (2023)³⁰⁹;
- Net Zero Strategy: Build Back Greener (2021)³¹⁰;
- The Ten Point Plan for a Green Industrial Revolution (2020)³¹¹;
- The Clean Growth Strategy (2017)³¹²;
- National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) (2023) (designated January 2024)³¹³;

³⁰³ The Carbon Budget Order 2016, available at: <https://www.legislation.gov.uk/ukxi/2016/785/made>

³⁰⁴ The Carbon Budget Order 2021, available at: <https://www.legislation.gov.uk/ukxi/2021/750/made>

³⁰⁵ Energy Act 2023, available at: <https://www.legislation.gov.uk/ukpga/2023/52>

³⁰⁶ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

³⁰⁷ British Energy Security Strategy (2022) available at: <https://www.gov.uk/government/publications/british-energy-security-strategy>

³⁰⁸ HM Government (2020). Energy White Paper: Powering our Net Zero Future, available at: https://assets.publishing.service.gov.uk/media/5fdc61e2d3bf7f3a3bdc8cbf/201216_BEIS_EWP_Command_Paper_Accessible.pdf

³⁰⁹ HM Government (2023). Powering Up Britain, available at: <https://assets.publishing.service.gov.uk/media/642468ff2fa8480013ec0f39/powering-up-britain-joint-overview.pdf>

³¹⁰ Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2021). Net Zero Strategy: Build Back Greener, available at: <https://www.gov.uk/government/publications/net-zero-strategy>

³¹¹ Department for Energy Security and Net Zero, Prime Minister's Office, 10 Downing Street, Department for Business, Energy & Industrial Strategy, The Rt Hon Lord Alok Sharma KCMG and The Rt Hon Boris Johnson (2020). The Ten Point Plan for a Green Industrial Revolution, available at: <https://www.gov.uk/government/publications/the-ten-point-plan-for-a-green-industrial-revolution>

³¹² Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy (2017). The Clean Growth Strategy, available at: <https://www.gov.uk/government/publications/clean-growth-strategy>

³¹³ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

- National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) (designated January 2024)³¹⁴; and
- National Planning Policy Framework (NPPF) (updated February 2025)³¹⁵.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)³¹⁶, specifically Policy CC6 ‘Solar Farms’;
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)³¹⁷;
- Rother Local Plan Core Strategy (Adopted 29th September 2014)³¹⁸, specifically Policy SRM1 ‘Towards a low carbon future’;
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)³¹⁹;
- Kent and Medway Energy and Low Emissions Strategy (2020)³²⁰;
- Kent County Council Net Zero Action Plan (2021)³²¹; and
- East Sussex County Council Climate Emergency Plan 2025-30 (2019)³²².

National Guidance

³¹⁴ Department for Energy Security and Net Zero (2023) National Policy Statement for Electricity Networks Infrastructure (EN-5), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

³¹⁵ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³¹⁶ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

³¹⁷ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

³¹⁸ Rother Local Plan - <https://rdcpbublic.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

³¹⁹ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

³²⁰ Kent and Medway Energy and Low Emissions Strategy (2020), available at: https://www.kent.gov.uk/_data/assets/pdf_file/0005/205448/Kent-and-Medway-Energy-and-Low-Emissions-Strategy.pdf

³²¹ Kent County Council Net Zero Action Plan (2021), available at: https://www.kent.gov.uk/_data/assets/pdf_file/0004/182263/KCC-Net-Zero-action-Plan.pdf

³²² East Sussex County Council Climate Emergency Plan 2025-30 (2019), available at: <https://www.eastsussex.gov.uk/environment/climate-change-action-in-east-sussex/climate-emergency-plan-2025-30>

- Assessing Greenhouse Gas Emissions and Evaluating their Significance (Institute of Environmental Management and Assessment (IEMA), 2022) (2022))³²³,
- Assessing Climate Change Resilience and Adaptation ((Institute of Environmental Management and Assessment (IEMA), 2020) (2020))³²⁴
- Planning Practice Guidance on Climate Change (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2019)³²⁵,
- A Corporate Accounting and Reporting Standard (The Greenhouse Gas Protocol, 2004)³²⁶; and
- Whole Life Carbon Assessment for the Built Environment (Royal Institution of Chartered Surveyors, 2023)³²⁷.

13.3. Existing Baseline Conditions

- 13.3.1. This section of the Scoping Chapter for Carbon and Climate Change sets out the known baseline conditions at this (scoping) stage of the Proposed Development. It is noted that further assessment is proposed to inform the technical assessment for the Environmental Statement (see details and scope of the further baseline data below under Section 13.9.1-13.9.6).

Study Area

GHG emissions

- 13.3.2. The GHG assessment would consider GHG emissions from within the Site boundary and those indirect emissions from activities outside the Site boundary.
- 13.3.3. The scope of the GHG assessment includes the addition of GHG emissions directly from construction, operation, and decommissioning activities undertaken within the Site boundary, including fuel consumption. It also includes indirect emissions which would occur outside the Site boundary, but

³²³ Institute of Environmental Management and Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance, available at: [2022 iema greenhouse gas guidance eia.pdf](https://www.iema.net/resources/reading-room/2022/06/26/iema-eia-guide-to-greenhouse-gas-guidance-eia.pdf)

³²⁴ Institute of Environmental Management and Assessment (2020) Climate Change Resilience and Adaptation. Available online: <https://www.iema.net/resources/reading-room/2020/06/26/iema-eia-guide-to-climate-change-resilience-and-adaptation-2020>

³²⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance on Climate Change, available at: <https://www.gov.uk/guidance/climate-change>

³²⁶ The Greenhouse Gas Protocol (2004) A Corporate Accounting and Reporting Standard, available at: <https://ghgprotocol.org/corporate-standard>

³²⁷ Royal Institution of Chartered Surveyors (2023) Whole Life, available at: <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment>

related to the activities of all stages of the Proposed Development, including, as an example, those from:

- the extraction, manufacture, and transportation of construction products and materials to the Site boundary;
- the transportation of workers to the Site boundary; and
- off-Site boundary transportation and disposal of waste.

13.3.4. These emissions would be estimated based upon project-specific data that may relate to activities outside the Site boundary (e.g., water provision and wastewater treatment outside of the Site boundary, transport of materials to the Proposed Development or the embodied carbon within construction materials, which would include the emissions associated with raw material extraction, transport to the manufacturing Site boundary and manufacturing emissions).

Climate Change Risk

13.3.5. As the climate change risk assessment is an assessment of the impact of the effects of climate change on the Proposed Development over its entire lifetime, the study area would be the area defined by the Site boundary.

Approach to the Collection of Baseline Data for Scoping

13.3.6. Site boundary information used to inform the baseline conditions for scoping in **section 13.3.910** is expanded upon in **Chapter 2: Description of the Site boundary and surrounding Area**.

13.3.7. Flood risk within the Site boundary has been informed by using the UK Government's flood map for planning tool (2024)³²⁸, which ranks an area's flood risk probability from different sources as either Flood Zone 1 (less than 0.1% chance of flooding annually), Flood Zone 2 (between 0.1% and 1% chance of river flooding annually, or between 0.5% and 1% chance of sea flooding annually), or Flood Zone 3 (greater than 1% chance of river flooding annually, or greater than 0.5% chance of sea flooding annually). See **Chapter 7: Hydrology**, for further detail.

13.3.8. Baseline data for climatic conditions within the Site boundary would be sourced from UK MET Office (2025)³²⁹ historical location-specific long-term climate averages from the closest climate station.

Relevant Baseline Conditions for Scoping

³²⁸ UK Government (2023) Flood map for Planning, available at: <https://flood-map-for-planning.service.gov.uk/>

³²⁹ UK Met Office (2025) Location-specific long-term averages. Available at: <https://www.metoffice.gov.uk/research/climate/maps-and-data/location-specific-long-term-averages/>

- 13.3.9. The baseline comprises existing carbon stock and sources of GHG emissions within the Site boundary of the existing activities on-Site boundary.
- 13.3.10. The land within the Site boundary predominantly consists of agricultural fields. Local ditches and field margins form the boundaries to many of the fields within the Site boundary, with further sporadic areas of hedgerow, trees and woodland.
- 13.3.11. According to the UK Government's flood map for planning tool (2024), the Site boundary is primarily within Flood Zones 2 and 3, showing the Proposed Development has a risk between medium to high (less than 1% to greater than 1%) chance of surface water flooding, river flooding and coastal flooding annually. See **Chapter 7: Hydrology**, for further detail.

Important Receptors Identified

- 13.3.12. The sensitive receptor for GHG emissions is the global atmosphere, which, by proxy, can be extended to the United Kingdom's (UK) commitments under the UK Climate Change Act 2008 (2050 Target Amendment) Order 2019³³⁰, which is aligned with the global goals of the 2015 Paris Agreement³³¹ (avoid dangerous climate change by limiting global warming to well below 2°C and pursuing efforts to limit it to 1.5°C).
- 13.3.13. In line with IEMA (2022)³³² guidance, the global atmosphere, as a receptor, has *"a high sensitivity, given the severe consequences of global climate change and the cumulative contributions of all GHG emissions sources"*.
- 13.3.14. The sensitive receptor relevant to the climate change risk assessment is the Proposed Development.

13.4. Environmental Measures

- 13.4.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce, and offset (where appropriate) likely significant effects. Specific environmental measures relevant to climate would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental

³³⁰ Climate Change Act 2008 (2050 Target Amendment) Order 2019, available at: <https://www.legislation.gov.uk/ukdsi/2019/9780111187654>

³³¹ The 2015 Paris Agreement, available at: <https://unfccc.int/process-and-meetings/the-paris-agreement>

³³² Institute of Environmental Management and Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance, available at: [2022_iema_greenhouse_gas_guidance_eia.pdf](https://www.iema.org.uk/2022-iema-greenhouse-gas-guidance-eia.pdf)

measures would be implemented and included within the Proposed Development.

GHG Emissions

Construction

13.4.2. An Outline Construction Environmental Management Plan (oCEMP) would be submitted in support of the DCO Application which would detail good working practices in line with appropriate standards, including low carbon practices. Some mitigation measures which would be investigated in order to determine their feasibility are:

- Where technical specifications allow, maximise the recycled content of construction materials such as concrete and steel;
- Maximise the specification of materials with an environmental product declaration with the aim of reducing embodied carbon emissions through the greater level of transparency and data quality provided by an environmental product declaration;
- On-Site boundary mobile and non-mobile plant should conform to the latest emissions standards, with mobile vehicles conforming to EURO 6 standards as a minimum. All plant should investigate the option of using Hydrotreated Vegetable Oil fuels or electric versions where possible; and
- Require main contractors to report on electricity and fuel consumption, water usage and waste disposal and their GHG emissions.

Operation

13.4.3. Given the nature of the Proposed Development as a renewable energy project, it is anticipated to have an overall positive effect on the climate with regards to GHG emissions. Despite this, adherence to best practice relating to the maintenance and replacement of components of the Proposed Development would be followed at all times. Any replacement and maintenance which takes place would also follow the mitigation measures proposed within the construction phase (where applicable). Additional mitigation measures for the operation phase would be detailed in the Outline Operational Environmental Management Plan (oOEMP), which would be submitted in support of the DCO Application.

Decommissioning

13.4.4. The decommissioning process is likely to result in GHG emissions, particularly from waste disposal of solar PV modules. Mitigation measures would be employed that align with the hierarchy for managing project-related emissions (avoid, reduce, substitute, and compensate). Mitigation measures for the decommissioning phase would be addressed in the Outline Decommissioning

Environmental Management Plan (oDEMP), which would be submitted in support of the DCO Application.

Climate Change Risk

Construction

- 13.4.5. UK Climate Projections (2018) (UKCP18) suggest that climate change would lead to hotter drier summers, warmer wetter winters, increased likelihood of extreme weather events (e.g., heat waves, high rainfall events) and sea-level rise.
- 13.4.6. Electrical infrastructure is anticipated to be Sited in locations at low risk of flooding or set at the necessary minimum ground levels.
- 13.4.7. An oCEMP would be submitted in support of the DCO Application which would detail measures to decrease the risk of climate hazards on the construction process phase. Some measures which would be investigated in order to determine their feasibility include:
- Weather forecasts to be monitored on a daily basis. Forecasts would be used to inform the sequencing of activities and the use of appropriate personal protective equipment;
 - Provision of welfare facilities including breaks, shade, and hydration facilities, as well as first aid amenities;
 - Provision of an Emergency Response Plan, to include on-Site boundary fire prevention, suppression, and evacuation procedures;
 - Provision of an Incident Response Plan that identifies flooding as a key Site boundary risk and identifies the correct policies and procedures to follow in the event of such;
 - Monitoring and maintenance of plant and equipment to ensure compliance of machinery with design specifications and flexibility in the construction activities programme to account for climatic variation;
 - Appropriate on-site storage of plant and equipment; and
 - Hazardous materials would be maintained in a safe storage area when not in use. This would be away from Site boundary access and egress points. Disposal of hazardous waste would be undertaken appropriately, taking into account the risks associated with high temperatures and increased rainfall, as outlined in the Outline Site boundary Waste Management Plan (oSWMP), which would be submitted in support of the DCO Application.

Operation

- 13.4.8. The condition and integrity of components of the Proposed Development would be regularly assessed, and maintenance undertaken as early as required,

considering materials with enhanced tolerance to fluctuating temperatures and exposure to rainfall. These measures would be detailed in by the oOEMP.

Decommissioning

- 13.4.9. Anticipating the most appropriate additional mitigation measures to be implemented during the decommissioning stage is difficult due to the potential advancements in technology and best practice between the present and the time in which decommissioning would take place. Despite this, general adherence to the additional mitigation measures proposed during the construction phase is advised. These measures would be detailed in by the oDEMP.

13.5. Scope of the Assessment

Consultation Undertaken to Date

- 13.5.1. No consultation has been undertaken to date in relation to climate. Further information on consultation completed to date for the Proposed Development is detailed in Section 5.5 of **Chapter 5: Approach to EIA**.

Effects Scoped Out from Detailed Assessment

- 13.5.2. Table 13.1 presents the climate matters that are unlikely to give rise to significant effects and which are, therefore, which are proposed to be scoped out from detailed assessment.

Table 13.1 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Climate change risk - Construction, operation & decommissioning	UK Climate Projections (2018) (UKCP18) suggest that climate change would lead to hotter drier summers, warmer wetter winters, increased likelihood of extreme weather events (e.g., heat waves, high rainfall events) and sea-level rise. Due to the embedded resilience of the primary components within a solar renewable development (solar PV modules, substations, inverters, transformers, battery energy storage systems (BESS), switchgears etc.) to high heat, extreme rain, and wind speeds, these factors are not expected to significantly impact on the construction, operation or decommissioning of the Proposed Development. Electrical infrastructure (solar PV modules, substations, inverters, transformers, BESS and switchgear) is anticipated to be Sited in locations at low risk of flooding and/or set at the necessary minimum ground levels determined by the Flood Risk Assessment and in agreement with the relevant prescribed consultees.

Potential Effect	Rationale to be Scoped Out
	The vulnerability of the Proposed Development to sea level rise, flooding, and its potential to exacerbate flooding is scoped out of this chapter because it would be covered in more technical detail in the stand-alone Flood Risk Assessment to be submitted in support of the DCO Application. See Chapter 7: Hydrology for more detail. The Flood Risk Assessment would, by nature, take into account the impact of climate change risk with regards to flooding on the Proposed Development. As stated, and expanded upon, in Chapter 7: Hydrology, flood risk defences are also present along the entire coast, which would mitigate the impact of coastal flooding. It is not anticipated that climate change would present a significant risk to human health or vegetation, within the context of the Proposed Development.
In-combination impact assessment - Construction, operation and decommissioning	The resilience of all receptors identified in other chapters are unlikely to be significantly affected by a combination of future climate change (e.g. temperature change, sea level rise, or wind), and the impacts of the Proposed Development. Given some sections of the Site boundary are located within Flood Zone 3, the potential in-combination impacts of heavy precipitation, and the Proposed Development would be assessed in more technical detail within the Flood Risk Assessment, to be submitted in support of the DCO Application. See Chapter 7: Hydrology, for more detail.

Likely Significant Effects Scoped into the Detailed Assessment

GHG Emissions

Construction

- 13.5.3. GHG emissions would be inevitable during the construction phase. Main GHG emissions sources are likely to be through fuel consumption and the embodied GHG emissions of materials.
- 13.5.4. It is not expected that the GHG emissions from construction would compromise the ability of the UK to meet its carbon reduction targets. However, in view of the cumulative contribution of all emissions towards climate change, and the fact that the global climate is highly sensitive to fluctuations in GHG emissions, the GHG emissions associated with the construction of the Proposed Development would have a negative effect upon the climate.

Operation

- 13.5.5. While it is acknowledged that the operation of the Proposed Development would result in emissions (for example through operational energy use, maintenance worker travel, repair and replacement of components), it is unlikely to contribute a significant amount of GHG emissions and is expected to achieve GHG emissions savings by offering additional renewable electricity generation in place of fossil fuel electricity generation. GHG emissions savings would persist for the entirety of the Proposed Development's lifespan and would contribute cumulatively towards GHG reduction targets set both locally and nationally. The GHG savings from the operation phase are anticipated to be greater than the GHG emissions associated with the construction and decommissioning phases, and would contribute to the decarbonisation of the National Grid, which would constitute a beneficial effect on climate.

Decommissioning

- 13.5.6. GHG emissions would be inevitable during the decommissioning phase, again due to the necessary use of heavy machinery, the disposal of waste materials, and the transport of workers. As is the case with construction, the receptor is not confined to the immediate vicinity of the Site boundary; instead, it is the global atmosphere. As such, the receptor is highly sensitive, in view of the cumulative contribution of all emissions towards climate change. With this in mind, the GHG emissions associated with the decommissioning of the Proposed Development would have a negative effect upon the climate.

13.6. Proposed Approach to the ES

Assessment Methodology

- 13.6.1. The assessment of the effects of GHG emissions arising from the Proposed Development would be carried out in accordance with:
- Assessing Greenhouse Gas Emissions and Evaluating their Significance (IEMA, 2022)³³³;
 - Royal Institute of Chartered Surveyors (RICS) Whole life carbon assessment for the built environment (2023)³³⁴;

³³³ Institute of Environmental Management and Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance, available at: [2022 iema greenhouse gas guidance eia.pdf](https://www.iema.org.uk/guidance/eia/pdf/2022_iema_greenhouse_gas_guidance_eia.pdf)

³³⁴ Royal Institution of Chartered Surveyors (2023) Whole Life, available at: <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment>

- Planning Practice Guidance on Climate Change (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, 2019)³³⁵; and
 - A Corporate Accounting and Reporting Standard (The Greenhouse Gas Protocol, 2004)³³⁶.
- 13.6.2. The assessment would quantify applicable Kyoto Protocol GHGs as measured in tonnes of carbon dioxide equivalence (tCO₂e), where equivalence means having the same warming effect as CO₂ over 100 years. The seven Kyoto Protocol gas groups are carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), sulphur hexafluoride (SF₆), perfluorocarbons (PFCs) and nitrogen trifluoride (NF₃).
- 13.6.3. The GHG baseline characterisation would be conducted using a desk-based assessment of current land use, existing carbon stock and any activities that could cause GHG emissions. However, in line with IEMA Guidance (2022), any agricultural land can generally be considered to have zero baseline emissions to ensure reasonable worst-case approach to establishing net GHG effect.
- 13.6.4. Data associated with the activities contributing to the construction, operation and decommissioning of the Proposed Development would be provided by the Applicant and technical specialists. Where it is not possible to collect this data, as this assessment represents a forecast of emissions and some information may not yet be known, secondary data (such as estimates, extrapolations, benchmarks and proxy data such as distance travelled) would be used. Emissions would then be quantified by applying the most relevant and up-to date emission factors.
- 13.6.5. Lifecycle GHG emissions associated with the Proposed Development would be reported using the modular structure as outlined in Royal Institution of Chartered Surveyors (2023) guidance³³⁷. The reporting modules are defined as follows, with 'A' modules corresponding to construction phase emissions, 'B' modules corresponding to operation phase emissions, and 'C' modules corresponding to decommissioning phase emissions:
- **A1-3 product stage** – this category includes the embodied emissions of materials used to construct the Proposed Development. It includes the emissions associated with raw material extraction, transport to the manufacturing Site boundary and manufacturing emissions;

³³⁵ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2019) Planning Practice Guidance on Climate Change, available at:

<https://www.gov.uk/guidance/climate-change>

³³⁶ The Greenhouse Gas Protocol (2004) A Corporate Accounting and Reporting Standard, available at:

<https://ghgprotocol.org/corporate-standard>

³³⁷ Royal Institution of Chartered Surveyors (2023) Whole Life, available at: <https://www.rics.org/profession-standards/rics-standards-and-guidance/sector-standards/construction-standards/whole-life-carbon-assessment>

- **A4 transport** – this comprises the emissions associated with the transport of materials from the manufacturing site to the construction Site boundary;
- **A5 construction and installation** – this source includes four sub-categories which include emissions from pre-construction demolition (if applicable), construction activities (such as equipment fuel use), material wastage and construction worker transport;
- **B1 in-use emissions** – emissions associated with refrigerant gas leaks (if applicable) and emission release from products or reabsorption into products (such as sequestration from timber);
- **B2-5 maintenance, repair, replacement and refurbishment** – this includes emissions associated with routine maintenance (B2), repair (B3), replacement of materials (B4) and any planned refurbishment (B5);
- **B6 operational energy** – energy used during the operation of the asset;
- **B7 operational water** – water used during the operation of the asset;
- **B8 user activities not covered in B1-7** – emissions may include transport of persons to and from the asset during operation, for example; and
- **C1-4 end of life** – this category includes deconstruction and demolition emissions (C1), transport of waste materials from the Site boundary to disposal site (C2), waste processing for recycling (C3) and disposal emissions from landfill (C4).

13.6.6. Given the international urgency of climate change, the sensitivity of the receptor (i.e. global atmosphere) to fluctuations in GHG emissions is considered 'Very High'. Thus, the level of the significance of effects is determined by the magnitude, and timing, of GHG emissions and the likelihood of avoiding severe climate change.

13.6.7. Aligned with IEMA Guidance (2022)³³⁸, any project that causes GHGs to be avoided, or removed from the atmosphere, has a beneficial effect that is always significant (**Table 13.2**). In such a scenario, the Proposed Development substantially exceeds the national net zero requirements and is thus aligned with the goal of the Paris Agreement to limit temperature rise to well below 2°C, aiming for 1.5°C.

³³⁸ Institute of Environmental Management and Assessment (2022) Assessing Greenhouse Gas Emissions and Evaluating their Significance, available at: [2022 iema greenhouse gas guidance eia.pdf](https://www.iema.gov.uk/guidance/eia/greenhouse-gas-guidance-eia.pdf)

Table 13.2 Framework for assessment of significant effects

Significance	Level	Criteria
Significant	Major adverse	Project adopts a business-as-usual approach, not compatible with the national Net Zero trajectory, or aligned with the goals of the Paris Agreement (i.e., a science-based 1.5°C trajectory). Greenhouse gas impacts are not mitigated or reduced in line with local or national policy for projects of this type.
	Moderate adverse	Project's greenhouse gas impacts are partially mitigated and may partially meet up-to-date policy; however, emissions are still not compatible with the national Net Zero trajectory or aligned with the goals of the Paris Agreement.
Not significant	Minor adverse	Project may have residual emissions, but the project is compatible with the goals of the Paris Agreement, complying with up-to-date policy and good practice.
	Negligible	Project has minimal residual emissions and goes substantially beyond the goals of the Paris Agreement, complying with up-to-date policy and best practice.
Significant	Beneficial	Project causes greenhouse gas emissions to be avoided or removed from the atmosphere, substantially exceeding the goals of the Paris Agreement with a positive climate impact.
13.6.8.	The significance of the GHG impacts of the Proposed Development on the climate would be determined by assessing the magnitude of emissions against both national and sectoral carbon budgets. The UK carbon budgets are only currently available to 2037 (6th carbon budget, 2033 – 2037); where carbon budgets are not available for certain assessment periods, a qualitative approach would be taken.	
13.6.9.	The renewable electricity from the Proposed Development is directly replacing that generated by fossil-fuel energy. Consequently, the GHG emissions savings from the operation of the Proposed Development would be assessed based upon a comparison of operational emissions per kWh energy generation against those from a gas-fuelled power station.	
13.6.10.	To assess the GHG savings of the Proposed Development, operational emissions from a Combined Cycle Gas Turbine would be used as a comparison, as it is currently the most carbon-efficient fossil-fuelled technology available. This would be supplemented with additional comparisons including against current UK grid electricity as well as alternative forms of renewable	

energy. Carbon payback periods would be presented against the whole lifecycle of the Proposed Development, as well as against operational emissions only.

- 13.6.11. In accordance with the IEMA (2022)³³⁸, *“All global cumulative GHG sources are relevant to the effect on climate change, and this should be taken into account in defining the receptor (the atmospheric concentration of GHGs) as being of ‘high’ sensitivity to further emissions. Effects of GHG emissions from specific cumulative projects therefore in general should not be individually assessed, as there is no basis for selecting any particular (or more than one) cumulative project that has GHG emissions for assessment over any other.”* Therefore, a detailed cumulative assessment is not proposed to be undertaken.

Assumptions and Limitations

- 13.6.12. To ensure transparency within the EIA process, the following difficulties and uncertainties have been identified:
- The accuracy of a GHG assessment depends on the quality of the data provided. Primary data should always be used where available. Where it is not possible to collect these data, as this assessment represents a forecast of emissions and some information may not yet be known, secondary data (such as estimates, extrapolations, benchmarks and proxy data such as distance travelled) would be used, based upon industry approximations and professional best practice. Assessments such as this, based largely on secondary data, should only be viewed as an estimate of GHG emissions impact and actual emissions may vary substantially. Thus, when necessary, a conservative approach would be undertaken to ensure a robust assessment of possible emissions sources. All assumptions and limitations, including exclusions, would be documented as part of the assessment; and
 - An emission factor is a representative value that relates the quantity of a pollutant released into the atmosphere with a unit of activity associated with the release of that pollutant. Emission factors are typically available from government publications, independent agencies, and scientific research journals; however, the quality and accuracy of such factors can vary substantially. Factors can differ depending on the research body and/or underlying methodologies applied. Emission factors would therefore only be sourced from reputable sources, such as the Department for Energy Security and Net Zero (2024).

14. Noise and Vibration

14.1. Introduction

- 14.1.1. This Chapter of the Scoping Report presents the scope of the detailed environmental impact assessment for noise and vibration on human receptors for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context and guidance, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It sets out the scope of the assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.

14.2. Review of Policy, Legislation, and Relevant Guidance

- 14.2.1. Legislation, planning policy and guidance relating to noise and vibration, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- Environmental Protection Act, 1990³³⁹;
- Control of Pollution Act, 1974³⁴⁰.

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)³⁴¹;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)³⁴²;
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023)³⁴³

³³⁹ Environmental Protection Act 1990, available at: <https://www.legislation.gov.uk/ukpga/1990/43/contents>

³⁴⁰ Control of Pollution Act 1974, available at: <https://www.legislation.gov.uk/ukpga/1974/40>

³⁴¹ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

³⁴² Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

³⁴³ Department for Energy Security and Net Zero (2023), National Policy Statement for Electricity Networks Infrastructure (EN-5), available at: https://assets.publishing.service.gov.uk/media/64252f852fa848000cec0f53/NPS_EN-5.pdf

- National Planning Policy Framework (NPPF) (updated February 2025)³⁴⁴, in particular paragraph 187 (e) (in relation to preventing unacceptable levels of noise) and paragraph 198 (in relation to mitigation and minimisation of noise impacts from new developments and protection of tranquil areas);
- The Noise Policy Statement for England, 2010³⁴⁵; and
- Planning Practice Guidance: Noise, 2019³⁴⁶.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)³⁴⁷, specifically Policy CC6 ‘Solar Farms’;
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)³⁴⁸; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)³⁴⁹.

National Guidance

- British Standard BS 4142, Methods for rating and assessing industrial and commercial sound, 2014 + 2019 Amendments³⁵⁰;
- British Standard BS 5228, Code of practice for noise and vibration control on construction and open Sites – Part 1: Noise and Part 2: Vibration, 2009 + 2014 Amendments³⁵¹;
- British Standard BS 7445, Description and measurement of environmental noise, Guide to quantities and procedures, 2003³⁵²;

³⁴⁴ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³⁴⁵ Noise Policy Statement for England (March 2010), available at: <https://www.gov.uk/government/publications/noise-policy-statement-for-england>

³⁴⁶ Planning Practice Guidance, Noise (2019), available at: www.gov.uk/guidance/noise--2

³⁴⁷ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

³⁴⁸ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

³⁴⁹ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

³⁵⁰ British Standard BS 4142, Methods for rating and assessing industrial and commercial sound, 2014 + 2019 Amendments

³⁵¹ British Standard BS 5228, Code of practice for noise and vibration control on construction and open sites – Part 1: Noise and Part 2: Vibration, 2009 + 2014 Amendments

³⁵² British Standard BS 7445, Description and measurement of environmental noise, Guide to quantities and procedures, 2003

- BS 6472, Guide to evaluation of human exposure to vibration in buildings, Part 1, Vibration sources other than blasting, 2008³⁵³;
- BS 7385, Evaluation and measurement for vibration in buildings – Guide to damage levels from groundborne vibration, 1993³⁵⁴;
- British Standard BS 8233, Guidance on sound insulation and noise reduction for buildings, 2014³⁵⁵;
- Calculation of Road Traffic Noise, Department of Transport, Welsh Office, 1988³⁵⁶; and
- Design Manual for Roads and Bridges, Sustainability and Environment Appraisal, LA 111, Noise and Vibration, 2020³⁵⁷.

14.3. Existing Baseline Conditions

- 14.3.1. This section of the Scoping Chapter for noise and vibration sets out the known baseline conditions at this (scoping) stage of the Proposed Development. Further surveys and assessment are proposed to inform the detailed technical assessment for the Environmental Statement (ES) (see details and scope of the further baseline data below under Section 14.8).

Study Area

- 14.3.2. The study area adopted for this scoping stage of the environmental noise and vibration assessment is a 500 m buffer from the Site boundary and underground and overhead line cabling search areas (see **Figure 14.1 within Appendix E**). This study area has been selected based on the maximum setback distance that is likely to be of relevance to this project. The study area has been based on the likely noise generating plant and equipment that would be required for a development of this type, along with previous experience of noise levels by other, similar projects. The ES would define study areas for each of the aspects of the assessment that are ultimately scoped in, and these study areas would be based on the relevant standards and guidance and the likely distances at which impacts could be experienced.

Approach to the Collection of Baseline Data for Scoping

³⁵³ BS 6472, Guide to evaluation of human exposure to vibration in buildings, Part 1, Vibration sources other than blasting, 2008

³⁵⁴ BS 7385, Evaluation and measurement for vibration in buildings – Guide to damage levels from groundborne vibration, 1993

³⁵⁵ British Standard BS 8233, Guidance on sound insulation and noise reduction for buildings, 2014

³⁵⁶ Calculation of Road Traffic Noise, Department of Transport, Welsh Office, 1988

³⁵⁷ Design Manual for Roads and Bridges, Sustainability and Environment Appraisal, LA 111, Noise and Vibration, 2020, available here: <https://www.standardsforhighways.co.uk/tse/attachments/cc8cfcf7-c235-4052-8d32-d5398796b364?inline=true>

- 14.3.3. For the purposes of scoping, baseline noise levels have been established by reference to strategic noise mapping for the local area. This data is available online³⁵⁸ and provides information on the likely levels of noise from public roads and railways across the UK. It is noted that the mapping of railway lines only includes those lines that form part of the national rail network. The Romney, Hythe and Dymchurch miniature railway to the east of the Proposed Development Site boundary is therefore not included in this mapping. Strategic noise mapping data (for both day and night-time periods) is shown in **Figures 14.2 and Figure 14.3 within Appendix E** respectively.
- 14.3.4. In addition to the strategic noise mapping data, initial baseline measurements have been carried out at a location adjacent to the Lydd Training Camp Ministry of Defence (MOD) site; to characterise existing baseline noise levels in this area for use in assessing the potential effects of operational noise on sensitive receptors within this Site boundary. These measurements were taken between 19th and 23rd August 2024 at a position off Jurys Gap Road (location LT5 in **Figure 14.4 within Appendix E**). Early baseline measurements were undertaken at this position, in discussion with the MOD, to avoid periods of training at the Lydd Training Camp. These measurements would therefore be expected to represent the quieter periods in this area. A summary of the measured noise levels is given in Table 14.1 below.

Table 14.1 Summary of Measured Baseline Noise Levels – LT 5

Period	LAeq	LA90	
	Average ³⁵⁹	Mean	Mode
Day (07:00 – 23:00)	53	46	50
Night (23:00 – 07:00)	52	43	33

- 14.3.5. In addition to the above, further baseline noise monitoring is proposed, as discussed in 14.6.1 and 14.6.2 below.
- 14.3.6. No information is currently available on baseline vibration levels, however it is likely that existing ambient ground-borne vibration levels in the vicinity of the Proposed Development are minimal. For vibration impacts to occur, the levels of vibration generated by the Proposed Development would need to be perceptible, and therefore significantly above the likely existing baseline vibration levels. As such, baseline vibration monitoring is not proposed, as these measurements would not affect the outcome of the assessment.

³⁵⁸ <https://environment.data.gov.uk/dataset/562c9d56-7c2d-4d42-83bb-578d6e97a517>

³⁵⁹ Logarithmic average of measured LAeq

Important Receptors Identified

- 14.3.7. The key receptors of relevance to the noise and vibration assessment are as follows:
- Residential properties in Lydd, particularly those on Robin Hood Lane, Harden Road and Station Road;
 - Residential properties to the west of Greatstone on Sea, particularly those on Dunes Road, Merritt Road, Baldwin Road and the adjoining residential roads; and
 - Residential properties to the west of New Romney, particularly those in the vicinity of Lydd Road.
- 14.3.8. Specific receptors of relevance for each aspect of the assessment would be described in the ES, once the aspects that are scoped into the assessment have been finalised.

14.4. Environmental Measures

- 14.4.1. Consideration would be paid to the opportunity to introduce environmental measures (and mitigation) that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to noise and vibration would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects would be undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). Appropriate measures for control of noise and vibration would be developed further in the ES for each noise and vibration aspect scoped into the assessment.

14.5. Scope of the Assessment

Consultation Undertaken to Date

- 14.5.1. Consultation on noise and vibration has commenced. Both Rother and Folkestone and Hythe District Councils have been consulted regarding the proposed baseline noise monitoring strategy including monitoring locations, duration, and methodology, before any monitoring is carried out. Further consultation would take place prior to the ES being produced.

Effects Scoped Out from Detailed Assessment

- 14.5.2. Table 14.2 presents the noise and vibration matters that are considered unlikely to result in significant effects and which are, therefore, proposed to be scoped out of detailed assessment.

Table 14.2 Effects Scoped Out of the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Construction traffic vibration	Perceptible levels of vibration at sensitive receptor locations due to construction traffic movements are unlikely, since roads are assumed to have a well-maintained surface or, where not suitable for heavy vehicles, would be upgraded prior to construction. It is therefore proposed that the effects of vibration from construction traffic are scoped out of the detailed assessment.
Operational traffic noise and vibration	It is anticipated that only minimal numbers of road traffic movements would be generated by the Proposed Development once it is operational, and would be no less than the worst case effects from construction, which is to be assessed. As such, it is proposed that noise and vibration effects from operational road traffic are scoped out of the detailed assessment.
Operational noise and vibration from cable routes	No noise or vibration would be generated by cables within the Site boundary during operation. Therefore, it is proposed that noise and vibration effects associated with cable routes be scoped out of the detailed assessment.
Operational plant and equipment vibration	Solar developments and the associated infrastructure do not make use of any plant or equipment that generate significant vibration levels during operation. As such, perceptible vibration levels at receptor locations due to the operation of plant and equipment is highly unlikely and the assessment of vibration effects from the operation of plant and equipment within the Site boundary is proposed to be scoped out of the detailed assessment.
Decommissioning noise and vibration	Information on decommissioning activities that would allow a detailed assessment of decommissioning activities to be assessed in the ES is unlikely to be available. Noise and vibration impacts during decommissioning would be expected to be no greater than those produced during construction, therefore detailed assessment of noise and vibration effects of decommissioning are proposed to be scoped out.

Likely Significant Effects Scoped into the Detailed Assessment

- 14.5.3. Table 14.3 presents the noise and vibration matters that could potentially give rise to significant adverse effects and which are proposed to be scoped into the detailed assessment.

Table 14.3 Likely Significant Effects Scoped into the Detailed Assessment

Potential Effect	Rationale to be Scoped In

Construction traffic noise	Traffic movements to and from the Site boundary during the construction phase have the potential to result in adverse noise impacts at sensitive receptors, depending on the proximity of construction traffic routes to receptors and the volume of vehicle movements required during construction. Consequently, the effects of construction traffic noise would be scoped into the detailed assessment.
On-site construction activity noise and vibration	Construction activities within the Proposed Development have the potential to generate both adverse noise and vibration impacts at nearby sensitive receptors, dependant on the precise nature and location of the construction work required. As such, the effects of both noise and vibration generated during construction activities are proposed to be scoped into the detailed assessment. This would include the assessment of noise and vibration generated by all construction activities, including construction of the proposed solar farm, any required ancillary equipment such as substation equipment, battery storage equipment, cable routes and Site boundary access roads.
Operational plant and equipment noise	Whilst solar panels are not a noise emission source when in operation, there is the potential for adverse noise impacts to be generated by ancillary equipment such as substations, battery storage equipment, inverters etc. The effect of operational noise from the proposed development is therefore proposed to be scoped into the detailed assessment.

14.6. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 14.6.1. A baseline noise survey would be undertaken to characterise the existing ambient noise environment. This would include unattended measurements of the existing ambient noise levels at locations representative of the noise sensitive receptors, supplemented by attended sample measurements where required. Monitoring locations would be discussed and agreed in principle with representatives of Folkestone and Hythe and Rother District Councils prior to the survey, but may be subject to variation depending on local Site boundary conditions.
- 14.6.2. The survey would be undertaken in accordance with BS 7445:2003. Unattended measurements would be undertaken over a period of 4-7 days, covering typical weekday and weekend periods. Monitoring locations would include positions representative of baseline conditions at noise sensitive receptors with potential exposure to noise from associated with the development. These may include

residential properties in New Romney, Greatstone on Sea, and Lydd, in addition to measurements already obtained near Lydd Training Camp.

Construction

Noise

- 14.6.3. The definition of appropriate assessment criterion and noise metrics for the purpose of identifying likely significant effects would take into account relevant national policies, standards and guidance, as described previously in Section 14.3 of this report.
- 14.6.4. Construction noise predictions would be carried out in accordance with guidance contained in BS 5228-1:2009+A1:2014, which would also be used to inform assessment and significance criterion. Calculations would be informed by indicative plant lists, working methods and proposed phasing plans. The determination of effect thresholds for the construction noise assessment is based upon the methodologies presented within Annex E of BS 5228-1:2009+A1:2014, an example of which is the 'ABC Method', as summarised in Table 14.4.

Table 14.4: Construction Noise (Fixed and Mobile Plant) – ‘ABC Method’ Noise Thresholds

Noise Source	Receptor	Period	Threshold value, in decibels (dB L _{Aeq,T})		
			Category A	Category B	Category C
Construction Noise	Residential	Daytime	65 dB L _{Aeq,12h}	70 dB L _{Aeq,12h}	75 dB L _{Aeq,12h}
	Residential	Evening	55 dB L _{Aeq,4h}	60 dB L _{Aeq,4h}	65 dB L _{Aeq,4h}
	Residential	Night	45 dB L _{Aeq,8hr}	50 dB L _{Aeq,8hr}	55 dB L _{Aeq,8hr}

Clarifications and notes:

Daytime: Weekdays (0700-1900hrs) and Saturdays (0700-1300hrs)

Evening: Weekdays (1900-2300hrs), Saturdays (1300-2300hrs), Sundays and Bank Holidays (0700-2300hrs)

Night-time: Weekdays, Weekends and Bank Holidays (2300-0700hrs)

*Rounded to the nearest 5 dB

Vibration

- 14.6.5. The consideration of construction ground-borne vibration effects, such as those associated with high-energy activities such as piling, shall be considered using criteria advocated in BS 5228-2:2009+A1:2014, and other vibration standards and guidance referenced in this Standard (e.g. BS 6472-1:2008 and BS 7385-2:1993).
- 14.6.6. The effect of human exposure to vibration from sources other than blasting is covered in BS 6472:2008. The standard provides guidance for predicting human response to vibration in buildings over the frequency range of 0.5 Hz to 80 Hz. It presents frequency-weighting curves for humans exposed to whole-body vibration, advice on measurement methods and methods for assessing continuous, intermittent and impulsive vibrations.
- 14.6.7. BS 6472:2008 uses the vibration dose value (VDV $\text{ms}^{-1.75}$) to determine the effect of vibration on human receptors within the buildings, as “[p]resent knowledge shows that this type of vibration is best evaluated with the vibration dose value (VDV).” As noted in BS 5228-2:2009+A1:2014, for construction it is considered more appropriate to consider effects of vibration levels in terms of Peak Particle Velocity (PPV mms^{-1}).
- 14.6.8. The use of the PPV metric is also consistent with the guidance within BS 7385:1993, which presents assessment criteria to be applied for the likelihood of cosmetic damage to buildings.
- 14.6.9. Table 14.5 provides a summary of the assessment criteria that are proposed to be adopted as the basis for the construction vibration assessment, given in terms of human response and derived based on guidance within BS 5228-2:2009+A1:2014 and BS 7385:1993.

Table 14.5: Vibration Limits for Human Response and Building (Cosmetic) Damage

Vibration Limit (PPV mms^{-1})	Effect
< 0.14	Vibration unlikely to be perceptible
0.14	Vibration might be just perceptible in the most sensitive situations for most vibration frequencies associated with construction. At lower frequencies, people are less sensitive to vibration
0.30	Vibration might be just perceptible in residential environments
1.00	It is likely that vibration of this level in residential environments would cause complaint, but can be tolerated if prior

Vibration Limit (PPV mms ⁻¹)	Effect
	warning and explanation has been given to residents
7.50	Guide value for cosmetic damage of residential buildings where dynamic loading may lead to resonance
10.00	Vibration is likely to be intolerable for any more than a very brief exposure to these levels in most building environments

Construction Traffic Noise

- 14.6.10. The calculation of changes in road traffic flows on the local road network during the construction noise phase would use the procedures described in the Department of Transport's 'Calculation of Road Traffic Noise' (CRTN, 1988) and presented in terms of Basic Noise Level (BNL). The results would be assessed by reference to significance criteria advised in Highways England 'LA 111 Noise and vibration' (LA111, 2020). The assessment criteria proposed to be used in the construction traffic assessment are summarised in Table 14.6.

Table 14.6 Change in Noise Level Categories

Noise Change Category	Short-term Change in Road Traffic Noise (dB LA10,18hr, or Lnight)
Negligible	<1 dB
Low	1 – 2.9 dB
Medium	3 – 4.9 dB
High	5 – 10 dB

Operation

- 14.6.11. The assessment of operational noise would be undertaken in line with national policies, namely the Noise Policy Statement for England (NPSE, 2010), taking into account relevant policies, standards and guidance set out above.
- 14.6.12. Operational noise at the identified sensitive receptors would be assessed against criterion developed using methodologies advocated in BS 4142, 2019, which states that:
- Typically, the greater the margin of operational noise above existing background, the greater the magnitude of the impact;

- An operational noise level of around +10 dB or more above background is likely to be an indication of a significant adverse impact, depending on the context;
- An operational noise level of around +5 dB above background is likely to be an indication of an adverse impact, depending on the context; and
- The lower the operational noise level is relative to the measured background sound level, the less likely it is that the specific sound source would have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.

Cumulative Effects

- 14.6.13. **Chapter 5: Approach to EIA** sets out the general approach to assessing the significance of cumulative effects, which would be followed in the preparation of the noise and vibration assessment.

Assumptions and Limitations

- 14.6.14. At this early stage of the project, limitations and uncertainties related to noise arise from the absence of detailed design information, including the quantities, locations and specifications of potentially noise generating plant and equipment during both construction and operation. As the design evolves, further information would become available, however additional uncertainties and limitations may also arise as a result of ongoing refinement. All relevant assumptions and limitations would be clearly described and addressed within the Environmental Statement.

15. Human Health

15.1. Introduction

- 15.1.1. This Chapter of the Scoping Report presents the scope of detailed environmental assessment for Human Health for the Proposed Development. This section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It concludes by setting out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.

15.2. Review of Policy, Legislation, and Relevant Guidance

- 15.2.1. Legislation, planning policy and guidance relating to Human Health explains the context that frames the approach to assessment and the public health objectives that form relevant considerations in undertaking the assessment and determining the application.

Legislation

- Health and Safety at Work Act (1974)³⁶⁰;
- The Planning Act 2008³⁶¹ - Introduced the DCO system for NSIPs and sets out provisions for EIA;
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017³⁶² – Section 5(2) requires EIAs to identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the Proposed Development on Human Health;
- Health and Care Act 2022³⁶³;
- Other legislation found in other aspect chapters, such as the Environmental Act 2021³⁶⁴, would be considered where necessary.

National Planning Policy

³⁶⁰ Health and Safety at Work Act (1974), HMSO, Available:

<https://www.legislation.gov.uk/ukpga/1974/37/contents>

³⁶¹ The Planning Act 2008 (2008), HMSO, Available: <https://www.legislation.gov.uk/ukpga/2008/29/contents>

³⁶² The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (2017), HMSO, Available: <https://www.legislation.gov.uk/uksi/2017/572/contents>

³⁶³ Health and Care Act 2022 (2022), HMSO, Available:

<https://www.legislation.gov.uk/ukpga/2022/31/contents>

³⁶⁴ Environment Act 2021 (2021), HMSO, Available: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

- Fit for the future: 10 Year Health Plan for England (Published July 2025)³⁶⁵, including a new focus of the NHS in taking an approach of moving from managing sickness to preventing ill health (e.g. through addressing inequalities in environmental conditions and the quality of jobs);
- Overarching National Policy Statement for Energy (EN-1) (2023)³⁶⁶ – Section 4.4 sets out the assessment principles for health, other sections that include health considerations are Section 4.12, 5.2, 5.11 and 5.16;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2025)³⁶⁷ – Section 2.10 provides the primary basis for decisions on solar photovoltaic DCO applications;
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (2025)³⁶⁸ provides the framework for decisions on nationally significant infrastructure projects (NSIPs) related to electricity networks, with Section 2.9 and 2.10 having relevant considerations in relation to public health and electromagnetic field exposures; and
- National Planning Policy Framework (NPPF) (December 2024 publication, revised February 2025)³⁶⁹, includes a series of relevant provisions in relation to sustainable development, public health and renewables projects, including at Paragraphs 96 (a-c), 85, 7 and 8.

Local Planning Policy

15.2.2. The Proposed Development is in the administrative boundary of Kent County Council and partially within East Sussex County Council, within the Folkestone and Hythe District Council boundary (for Kent) and Rother District Council boundary (for East Sussex). Hence the following are relevant to this assessment:

- Folkestone and Hythe District Council Places and Policies Local Plan (adopted September 2020)³⁷⁰, specifically Policy CC6 ‘Solar Farms’. Policy CC6 does

³⁶⁵ Department of Health and Social Care (2025), 10 Year Health Plan for England: fit for the future – policy paper. Available at: <https://www.gov.uk/government/publications/10-year-health-plan-for-england-fit-for-the-future>

³⁶⁶ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

³⁶⁷ Department for Energy Security and Net Zero (2025), National Policy Statement for renewable energy infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3>

³⁶⁸ Department for Energy Security and Net Zero (2025), National Policy Statement for renewable energy infrastructure (EN-5), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

³⁶⁹ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (December 2024 publication, revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

³⁷⁰ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

not include specific provisions related to health, however the development of new solar farms or extension of existing solar farms would only be acceptable where *“the proposal does not have any adverse visual impact on scenic beauty”*, indirectly impacting health.

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)³⁷¹. This states that *“proposals shall create a vibrant, healthy place to live by promoting physical activity and more active lifestyles for all age groups, facilitating community building.”*
- Rother District’s adopted Core Strategy (2014) includes the Overall Spatial Strategy element of *“developing the economy, healthy lifestyles and the role of culture, sports, arts, tourism and leisure”*.
- Rother District emerging Local Plan (Reg 18 consultation version)³⁷². Includes policy HWB1 which states *“The design and function of new development must help to create healthy, inclusive and safe places which reduce health inequalities, support and address the health and wellbeing needs in Rother as identified in the Joint Strategic Needs Assessment”*. It also includes HWB2 requiring a Health Impact Assessment³⁷³ (HIA) of all developments equal to or exceeding a Site boundary of 5 hectares. Such HIAs are required to incorporate and address the considerations contained with the East Sussex HIA toolkit (in development).
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)³⁷⁴, including Policy DM 11: Health and Amenity.

15.2.3. Furthermore, the East Sussex Health and Wellbeing Strategy³⁷⁵ is a rolling strategy, currently covering a period of five years until 2027. Priorities are provided for: (i) children and young people, (ii) mental health, (iii) community, (iv) urgent care and (v) planned care. The strategy then details the common themes among these priorities. The themes are intended to inform every decision in this area. They are: (i) improving health and reducing health

³⁷¹Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

³⁷² Rother District Reg 18 Local Plan 2020-2040. https://rdcpbublic.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan_Reg-18_version_Final.pdf

³⁷³ Health impact assessment (HIA) is a process which systematically judges the potential, and sometimes unintended, effects of a project, program, plan, policy, or strategy on the health of a population and the distribution of those effects within the population. HIA generates evidence for appropriate actions to avoid or mitigate health risks and promote health opportunities. HIA guides the establishment of a framework for monitoring and evaluating changes in health as part of performance management and sustainable development. Winkler, M.S., Viliani, F., Knoblauch, A.M., Cave, B., Divall, M., Ramesh, G., Harris-Roxas, B. and Furu, P. (2021) Health Impact Assessment International Best Practice Principles. Special Publication Series No. 5. Fargo, USA: International Association for Impact Assessment.

³⁷⁴ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

³⁷⁵ East Sussex County Council (n.d) Healthy lives, healthy people: East Sussex Health and Wellbeing Board strategy. Available: <https://www.eastsussex.gov.uk/social-care/policies/health-wellbeing-strategy>

inequalities, (ii) improving access to local services, (iii) bringing together health and social care and (iv) urgent and emergency care.

- 15.2.4. The Kent Joint Health and Wellbeing Strategy (until 2021)³⁷⁶ has been replaced by a Kent and Medway Integrated Care Strategy³⁷⁷ and shared delivery plan for 2024-2026. The integrated strategy between the two authorities aims to make health and wellbeing in the area 'better than any partner can do alone'. Its key outcomes include:
- Giving children and young people the best start in life;
 - Tackling wider determinants to prevent ill health (including social, economic and environmental determinants as well as addressing inequalities);
 - Supporting happy and healthy living for all (including supporting people to adopt positive mental and physical health and support people to live and age well, be resilient and independent);
 - Empowering patients and carers (including those with multiple or long-term conditions through multidisciplinary teams);
 - Improving health and care services (including improving equity of access to services); and
 - Supporting and growing the workforce.
- 15.2.5. In January 2025, Kent County Council published a draft of their specific contribution to the Improved Health and Integrated Care Strategy³⁷⁸. Within it, the Council have issued proposed priorities and actions to improve health and wellbeing in public health, public health education, communities, human resources and organisational development, procurement, adult social care and growth, environment and transport.
- 15.2.6. East Sussex has a Joint Strategic Needs Assessment (JSNA)³⁷⁹ which establishes local health and care needs. It informs the Health and Wellbeing Strategy, and consists of several smaller needs assessments and insights, forming an overall picture of need in East Sussex. Five JSNA priorities for 2025 are:
- building blocks of good health, related to decent homes, education and employment alongside good social connections and community;

³⁷⁶ Kent Council, on behalf of the Kent Health and Wellbeing Board (n.d) Kent Joint Health and Wellbeing Strategy, outcomes for health. Available: <https://www.folkestone-hythe.gov.uk/downloads/file/1423/eb-10-20-fhdc-the-kent-joint-health-wellbeing-strategy>

³⁷⁷ Kent and Medway Integrated Care Strategy (2024), Shared Delivery Plan 2024-2026. Available: <https://democracy.kent.gov.uk/documents/s125849/Appendix%201%20-%20Kent%20and%20Medway%20Integrated%20Care%20Strategy%20Shared%20Delivery%20Plan.pdf>

³⁷⁸ Kent County Council (n.d) Improving Health and Wellbeing – Kent County Council Priorities and Actions DRAFT. Available: <https://democracy.kent.gov.uk/mgConvert2PDF.aspx?ID=128985>

³⁷⁹ East Sussex Joint Strategic Needs Assessment (2025). Available: <https://www.eastsussexjsna.org.uk/>

- the importance of a life course approach, from a good start in life, through to living and ageing well, and a good end in life;
- reducing health inequalities that underpin all actions;
- improving healthy life expectancy (HLE) by enabling healthy behaviours and reducing risk and impact of chronic disease and ill-health; and
- mental health and wellbeing, focusing on prevention and early support.

15.2.7. Kent also has a JSNA³⁸⁰, which includes information on local needs, including the building blocks of health and data on health inequalities. Included are district profiles which summarise information about health and wellbeing at the local level.

National Guidance

- Nationally Significant Infrastructure Projects: Technical Advice for Scoping Solar Development³⁸¹ includes a Solar Scoping Table that gives information that may be used to support scoping common matters out of EIAs for solar NSIP developments.
- Planning Practice Guidance (PPG) (2024)³⁸² Healthy and Safe Communities³⁸³, provides guidance on promoting health and safe communities in relation to the NPPF and mentions health impact assessments as a useful tool to use where there are expected to be significant impacts. Several further PPG guidance notes are relevant indirectly to the health assessment, namely:
 - Air Quality³⁸⁴,
 - Climate Change³⁸⁵,
 - Environmental Impact Assessment³⁸⁶,
 - Flood Risk and Coastal Change³⁸⁷,
 - Land affected by Contamination³⁸⁸,
 - Natural Environment³⁸⁹,

³⁸⁰ Kent County Council (2025) Kent Public Health Observatory JSNA. Available: <https://www.kpho.org.uk/joint-strategic-needs-assessment>

³⁸¹ Planning Inspectorate (2024). Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-technical-advice-page-for-scoping-solar-development>

³⁸² Ministry of Housing, Communities & Local Government, (2024), Planning Practice Guidance <https://www.gov.uk/guidance/health-and-wellbeing>

³⁸³ <https://www.gov.uk/guidance/air-quality--3>

³⁸⁴ <https://www.gov.uk/guidance/climate-change>

³⁸⁵ <https://www.gov.uk/guidance/environmental-impact-assessment>

³⁸⁶ <https://www.gov.uk/guidance/flood-risk-and-coastal-change>

³⁸⁷ <https://www.gov.uk/guidance/land-affected-by-contamination>

³⁸⁸ <https://www.gov.uk/guidance/natural-environment>

- Noise³⁹⁰,
- Open space, sports and recreation facilities, public rights of way and local green space³⁹¹,
- Renewable and Low Carbon Energy³⁹², and
- Travel Plans, Transport Assessments and Statements³⁹³;
- The Institute of Sustainability & Environmental Professionals (ISEP) (formerly the Institute of Environmental Management and Assessment (IEMA)) Determining Significance for Human Health in Environmental Impact Assessment (2022)³⁹⁴ – provides guidance on consideration of health as a topic within an EIA;
- ISEP (formerly IEMA) Effective Scoping of Human Health in Environmental Impact Assessment (2022)³⁹⁵ – provides guidance on proportionate scoping of Human Health within an EIA;
- Institute of Public Health (IPH) Guidance, Standalone Health Impact Assessment and health in environmental assessment (2021)³⁹⁶ – a general guide to meeting HIA requirements including through integrated assessments;
- Public Health England, Health Impact Assessment in spatial planning (2020)³⁹⁷ – discusses how HIA requirements can be met through the EIA Human Health assessment; and
- Public Health England. Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning (NSIP) Regime (2021)³⁹⁸.

Relevant Supplementary International Guidance

³⁹⁰ <https://www.gov.uk/guidance/noise--2>

³⁹¹ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

³⁹² <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

³⁹³ <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements>

³⁹⁴ Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekermawi, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

³⁹⁵ Pyper, R., Lamming, M., Beard, C., Waples, H., Birley, M., Buroni, A., Douglas, M., Turton, P., Hardy, K., Netherton, A., McClenaghan, R., Barratt, T., Bhatt, A., Fenech, B., Dunne, A., Hodgson, G., Gibson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Effective Scoping of Human Health in Environmental Impact Assessment.

³⁹⁶ https://www.publichealth.ie/sites/default/files/resources/guidance_2.pdf

³⁹⁷ <https://www.gov.uk/government/publications/health-impact-assessment-in-spatial-planning>

³⁹⁸ PHE, 2021. Advice on the content of Environmental Statements accompanying an application under the Nationally Significant Infrastructure Planning Regime, London: Public Health England.

- International Association for Impact Assessment (IAIA) and European Public Health Association. A reference paper on addressing Human Health in EIA (2020)³⁹⁹ and academic discussion of the same (Cave et al., 2021)⁴⁰⁰;
- International Association for Impact Assessment. Health Impact Assessment International Best Practice Principles, (2021)⁴⁰¹; and
- World Health Organisation (WHO) guidelines on air quality and noise (Berglund et al., 1999; Guski et al., 2017; WHO, 2009; WHO, 2021).

Local Guidance

- 15.2.8. The team has not located any specific Health Impact Assessment guidance or guidelines for Kent County nor East Sussex County (noting the East Sussex HIA toolkit is in development and would be referenced if available at the time of assessment).

15.3. Existing Baseline Conditions

- 15.3.1. This section of the Scoping Chapter for Human Health sets out the known baseline conditions at this (scoping) stage of the Proposed Development. It is noted that further data reviews and assessment are proposed to inform the technical assessment for the Environmental Statement (ES) (see details and scope of the further baseline data below under Section 15.7).

15.4. Study Area

- 15.4.1. The Proposed Development is mostly located in the administrative boundary of Kent County Council (approximately 1,043ha) and partially within East Sussex County Council (approximately 51ha), within the Folkestone and Hythe District Council boundary (for Kent) and Rother District Council boundary (for East Sussex). The Site boundary is predominantly arable agricultural land and consists of a mixture of Grade 1 (Excellent), Grade 2 (Very Good), Grade 3 (Good to Moderate) and Grade 4 (Poor) land. This classification is based on publicly available data from Natural England⁴⁰².

³⁹⁹ Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Vilianni, F., Xiao, Y. 2020. Human health: Ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association.

⁴⁰⁰ Cave, B.; Pyper, R.; Fischer-Bonde, B.; Humboldt-Dachroeden, S.; Martín-Olmedo, P. Lessons from an International Initiative to Set and Share Good Practice on Human Health in Environmental Impact Assessment. *Int. J. Environ. Res. Public Health* 2021, 18, 1392. <https://doi.org/10.3390/ijerph18041392>

⁴⁰¹ <https://iaia.org/wp-content/uploads/2025/02/BEST-PRACTICE-HIA.pdf>

⁴⁰² Natural England Open Data, Defra group ArcGIS Online organisation (2017, last updated, 2024). Provisional Agricultural Land Classification (ALC) (England). Available: <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::provisional-agricultural-land-classification-alc-england/about>

- 15.4.2. The nearest towns and villages to the Proposed Development include Lydd approximately 15m from the Proposed Development, Greatstone approximately 40m to the east, New Romney approximately 360m to the north, Old Romney approximately 1.4km to the north-west, Lydd-on-Sea approximately 3.6km to the north-east and Dungeness approximately 4.3km to the south-east.
- 15.4.3. The study area for health would be determined by reference to the study areas for other key disciplines where effects assessed by other disciplines are also relevant to Human Health effects. A key issue in terms of health would be the Landscape and Visual impact of the Proposed Development. **Chapter 11: Landscape and Visual**, applying relevant guidance, suggests a 2km radius from the Proposed Development would be a suitable study area. Other health determinants such as noise and air would be relevant. **Chapter 17: Air Quality** suggests a study area within a 250m radius of the Proposed Development. **Chapter 14: Noise and Vibration** suggests a 500m buffer. Therefore, the focus of the study area within which the majority of significant effects would fall would be dictated by the LVIA and be a 2km radius from the Study Area. It should be noted that some of the socio-economic effects may be wider than 2km (e.g. in terms of employment). Where significant socio-economic effects that are relevant to health fall outside of the study area, these would be considered.
- 15.4.4. The Human Health study areas relate to:
- The Site-specific population of the wards⁴⁰³ of:
 - Walland & Denge Marsh (E05010027), in relation to Lydd, Greatstone-on-Sea and surrounding populations, relevant to the majority of Site boundary. Including Folkestone and Hythe 013C which is in the 10% most deprived; Folkestone and Hythe 011D lower layer super output area (LSOA) which is in the 20% most deprived; and Folkestone and Hythe 011E LSOA which is in the 30% most deprived on the 2025 index of multiple deprivation⁴⁰⁴; and.
 - New Romney (E05010022) in relation to New Romney and surrounding population, relevant to South Brooks B, including Folkestone and Hythe 012C LSOA, which is in the 20% most deprived on the 2025 index of multiple deprivation.
 - Eastern Rother (E05011616) in relation to the Camber and surrounding population, relevant to South Brooks C. Including Rother 002A LSOA, which is in the 20% most deprived on the 2025 index of multiple deprivation.
 - The local population of Folkestone and Hythe District Council and Rother District Council.

⁴⁰³ Electoral Wards 2021 to align with OHID Fingertips current ward level data release. Revised ward definitions would be used if there is a subsequent OHID Fingertips ward level data update, e.g. to 2025 ward boundary definitions.

⁴⁰⁴ HM Government (2025). Ministry of Housing, Communities & Local Government. English indices of deprivation (published 30 October 2025). available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025/english-indices-of-deprivation-2025-statistical-release>

- The wider population of Kent County Council and East Sussex County Council.
- The national population of England, in relation to public benefits of renewable energy security.

15.4.5. The Human Health study area is visualised in **Figure 15.1 within Appendix E** which shows the geographic extent of the study area. The Human Health study area would be refined as appropriate in relation to the cable corridor and on-site substation(s) and other Proposed Development infrastructure once the design details of those elements are further developed. At this stage with the connection to the National Grid Dungeness Substation being within Walland & Denge Marsh ward it is not considered that a wider site-specific area would be required.

Approach to the Collection of Baseline Data for Scoping

15.4.6. For the purposes of the Scoping Report, baseline health conditions have been established by referencing public health data for Kent and East Sussex issued by the Office for Health Improvement and Disparities (OHID). Reference is also made to the East Sussex Health and Wellbeing Strategy⁴⁰⁵, Kent and Medway Integrated Care Strategy³⁷⁷ and the Folkestone & Hythe District Profile⁴⁰⁶ under the Kent County Council JSNA and East Sussex JSNA in relation to Rother.

Relevant Baseline Conditions for Scoping

- 15.4.7. Relevant health indicators for Kent, East Sussex and England are set out in Table 15.1 below using the latest OHID public health data⁴⁰⁷. The assessment stage would set out a more detailed baseline, including indicators at ward level and relevant community profiles.
- 15.4.8. Life expectancy in both Folkestone & Hythe and East Sussex is similar to England overall, with the greatest variation from the national average recorded for men (over a three-year range) in Folkestone & Hythe, where life expectancy is 1.3 years lower than the national average. The East Sussex Health and Wellbeing Strategy⁴⁰⁸ states that there are wide variations within the county with respect to life expectancy, highlighting that the gap in life-expectancy between the most and least-deprived areas in the county is more than 11 years for men

⁴⁰⁵ East Sussex County Council (n.d) Healthy lives, healthy people: East Sussex Health and Wellbeing Board strategy. Available: <https://www.eastsussex.gov.uk/social-care/policies/health-wellbeing-strategy>

⁴⁰⁶ Kent County Council (2025) Kent Public Health Observatory JSNA. Available: <https://www.kpho.org.uk/joint-strategic-needs-assessment>

⁴⁰⁷ Department of Health and Social Care (n.d.) Available: [Fingertips | Department of Health and Social Care](#)

⁴⁰⁸ East Sussex County Council (n.d) Healthy lives, healthy people: East Sussex Health and Wellbeing Board strategy. Available: <https://www.eastsussex.gov.uk/social-care/policies/health-wellbeing-strategy>

and almost 10 years for women. In Kent, this gap was just under 8 years for men and 5.6 years for women⁴⁰⁹, as described in Kent's JSNA.

- 15.4.9. Folkestone & Hythe has a higher-than-national-average value for general (all causes) under-75 mortality rates. The value for emergency hospital admissions for intentional self-harm is well below the national average in Folkestone & Hythe, and on the contrary, higher in East Sussex than the national average. No data is available via OHID for indicators on mortality rate due to respiratory disease, nor the percentage of people who report having a limiting long-term illness or disability.
- 15.4.10. Relevant demographic and behavioural indicators for Folkestone & Hythe, Rother, Kent (County), East Sussex (County) and England are provided in Table 15.1 below. This highlights that both geographic locations relevant to this assessment have older populations, with a higher percentage of people aged 65+ than in England overall.
- 15.4.11. Behavioural indicators for ill-health in adults like smoking and obesity are both lower in East Sussex (County) compared to the national average. Folkestone & Hythe has a slightly greater percentage of adult overweight prevalence than the national average, and a significantly lower percentage of adult smoking prevalence than the national average. Finally, both Folkestone & Hythe and East Sussex (County) have a higher percentage of physically active adults than the national average.
- 15.4.12. Folkestone & Hythe is classed as one of the most deprived areas in the county according to the 2025 Kent JSNA Summary Report⁴¹⁰. Folkestone & Hythe District has an Indices of Multiple Deprivation (IMD) score of 24.1 (Table 15.2), higher than all other areas within scope and greater than the national average of 21.7. All other areas within scope have a lower IMD than the national average.

⁴⁰⁹ Kent County Council (2025) Kent Public Health Observatory JSNA. Available: <https://www.kpho.org.uk/joint-strategic-needs-assessment>

⁴¹⁰ Watkins, D. (2025) 2025 Kent Joint Strategic Needs Assessment (JSNA) Summary report, available: <https://democracy.kent.gov.uk/documents/s128981/2025%20Kent%20Joint%20Strategic%20Needs%20Assessment%20JSNA%20Summary%20-%20Report.pdf>

Table 15.1 Health Indicators

Indicator	Folkestone & Hythe District	Rother District	Kent County	East County	Sussex	England
Life expectancy at birth (Male, 1-year range)	78.0	80.8	79.7	80.2		79.3
Life expectancy at birth (Female, 1-year range)	83.3	83.5	83.8	83.7		83.2
Under 75 mortality rate from all causes	373.0	309.8	315.8	318.0		341.6
Under 75 mortality rate from cardiovascular diseases	56.2	59.9	66.4	61.4		77.4
Under 75 mortality rate from cancer	125.2	113.4	114.2	122.8		120.8
Emergency hospital admissions for intentional self-harm	56.3	227.7	116.3	192.7		117.0
Suicide rate	11.0	9.9	11.7	11.7		10.7
Employment rate	71.1	64.6	77.2	75.2		75.7

Table 15.2 Behavioural Indicators

Indicator	Folkestone & Hythe district	Rother District	Kent County	East Sussex County	England
Percentage of population under 18	18.7	16.8	21.6	18.7	20.8
Percentage of population aged 65+	25.5	32.5	20.5	26.5	18.7
Smoking prevalence aged 18+ (current smokers, %)	6.2	15.3	11.4	11.4	11.6
Overweight prevalence aged 18+ (adjusted self-reported height and weight)	68.9	68.6	64.8	63.1	64.5
Percentage of physically active adults	72.4	69.8	66.9	69.1	67.4
Deprivation score (IMD 2025)	25.2	22.5	20.7	21.2	20.1

- 15.4.13. The East Sussex Health and Wellbeing Strategy highlights some further details for the County. It argues that with more older people, East Sussex is likely to have higher health and care needs than other areas of similar size. It also predicts that by 2028, around 20,000 more people in East Sussex would be living with two or more long-term health conditions than was the case a decade earlier. Furthermore, there is a rise in the number of children with statements of special education needs and disability, some of whom would have complex medical and care needs.
- 15.4.14. The 2025 Kent JSNA shows that Folkestone & Hythe has a higher rate of disabled residents (people who reported their condition limited their day-to-day activities; 21.8%) than the national average (17.3%). Limited further information is available for the district.

Important Receptors Identified

- 15.4.15. As confirmed by the ISEP guidance³⁹⁵ *“for health in EIA, population groups are the sensitive receptors, the health outcomes of which are considered”*.
- 15.4.16. Key receptors to be considered in the assessment would be the vulnerable or priority groups identified through the baseline analysis, as well as the general population in the impact areas as a comparator. The Effective Scoping of Human Health in EIA⁴¹¹ outlines that ‘*Relevant population groups for each scoped in wider determinant of health should consider both geographic populations and vulnerable sub populations*’. Sub populations with vulnerability are listed as:
- Young age;
 - Older age;
 - Low income or unemployment;
 - Health status (i.e. those with existing poor physical or mental health);
 - Social disadvantage; and
 - Access or geographic challenges (i.e. relevant subgroups experiencing barriers in access to services, amenities or facilities).
- 15.4.17. These groups would be considered sensitive receptors for the purpose of the assessment. In addition, Public Right of Way (PRoW) users would be considered – there are three local footpaths and two public bridleways that either run through or are in direct proximity to the Proposed Development.

⁴¹¹ IEMA (2022) IMA Guide to: Effective Scoping of Human Health in Environmental Impact Assessment, Available: <https://www.iema.net/media/s35fughe/iema-eia-guide-to-effective-scoping-of-human-health-nov-2022.pdf>

- 15.4.18. The assessment would also draw on receptors identified in the technical assessments of other Environmental Statement (ES) chapters as appropriate. For example, buildings, dwellings or amenities that are indicative of the presence of vulnerable groups, such as schools or healthcare facilities.

15.5. Environmental Measures

- 15.5.1. Opportunity to introduce environmental measures would be actively sought to avoid or reduce the potential for adverse significant population effects to occur, as well as where feasible measures exist to improve beneficial population health outcomes and reduce health inequalities.
- 15.5.2. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to Human Health would be identified and would be considered as part of the assessment (i.e. the assessment of likely significant effects would be undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage, the following environmental measures would be implemented and included within the Proposed Development.

Construction

- 15.5.3. Measures to minimise health impact from development are already being embedded in the design of the Proposed Development. These are:
- An outline Construction Environmental Management Plan (oCEMP), secured by DCO Requirement, would set out site-specific procedures and mitigation measures to monitor and control environmental impacts, including those relevant to health (i.e. minimising air quality, visual and noise impacts) throughout the construction phase of the Proposed Development.
 - The solar PV modules would be fixed, and no solar tracking system is proposed. This would avoid associated operational noise associated with tracking mechanisms, and potential for any associated health effects of such noise. Fixed modules also reduce the height and visual impact compared to a solar tracking system.
 - There would also be Battery Energy Storage System (BESS) units. These units would comprise an enclosure for electrochemical components and associated equipment, containers or enclosures for housing any of the equipment, necessary heating, ventilation and air conditioning (HVAC) systems, and fire safety infrastructure such as water storage tanks, and hard standing areas to allow access for emergency vehicles. These measures reduce electrical, chemical spill and fire risks relevant to public health.
 - An outline Construction Traffic Management Plan (oCTMP), secured by DCO Requirement, would propose how construction traffic, including Site boundary personnel movements, would be controlled safely by the Applicant and its sub-

contractors. It would document how risks from construction traffic would be minimised (including environmental risks) which in turn would reduce health effects from traffic.

- Access tracks would typically be constructed using compacted earth, hardcore, trackpad covered ground, gravel over a levelling layer of subbase, or existing metalled surfaces, depending on ground conditions and archaeological constraints, reducing dust within the construction phase.
- An outline Soils Management Plan (oSMP), secured by DCO Requirement, would manage any potential impacts to the soil (and agricultural land) during and on completion of the Proposed Development. It would set out further information on the areas which may be more susceptible to damage, and would further set out measures for soil management.
- An outline Employment Skills and Supply Chain Management Plan (oESSMP), secured by DCO Requirement, setting out measures to maximise opportunities to promote economic benefits in relation to skills, supply chains, and employment in the local region, which is required to deliver the entirety of the Proposed Development. This should include measures tailored to increase the accessibility of the training and employment opportunities for local vulnerable groups, supporting a beneficial population health effect in reducing health inequalities.
- An outline Public Right of Way Management Plan (oPROWMP), secured by DCO Requirement, would consider how to operate the PROW, in terms of managing both user safety and accessibility on PROW and proposed Permissive Paths, during the construction, operation and decommissioning of the Proposed Development. This should include considerations in relation to maintaining or improving equitable access by vulnerable groups, as well as promoting use of the PROW network for the site-specific populations.

Operation and Maintenance

- 15.5.4. The operational phase would be managed by an Operational Environmental Management Plan (OEMP). An outline OEMP (oOEMP) would be submitted with the DCO application. The Proposed Development would be managed by a Landscape and Ecology Management Plan (LEMP), secured by DCO Requirement. An outline LEMP (oLEMP) would be submitted with the DCO application. Both documents would outline measures to reduce operational adverse effects and enhance beneficial effects where appropriate and proportionate, including for population health.
- 15.5.5. The oSMP would also set out measures to minimise impacts to soil and the oPROWMP would consider accessibility and Permissive Paths during the Operation phase.

Decommissioning

- 15.5.6. The decommissioning date would be secured within the DCO. After 60 years of operation, decommissioning would commence. The Site boundary would be returned to its original use as far as possible and practical, with areas of established mitigation left in-situ where possible and in agreement with the landowners. Above ground infrastructure would be dismantled and recycled or disposed of in accordance with best practice policy and requirements at that time. The use of decommissioned materials would follow the waste hierarchy such that they would be reused where possible before recycling and disposal were considered.
- 15.5.7. The decommissioning phase would be managed by a Decommissioning Environmental Management Plan (DEMP). An outline DEMP (oDEMP) would be submitted with the DCO application.
- 15.5.8. The oPROWMP would also address accessibility and Permissive Paths during the decommissioning phase.

15.6. Scope of the Assessment

- 15.6.1. Health is the result of a complex interaction of a wide range of different determinants, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments and global ecosystem trends.
- 15.6.2. The best-known definition of health was produced by the World Health Organisation (WHO) as "Health is a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity"⁴¹². This definition would be used as the basis for the assessment.
- 15.6.3. Table 5.1 of the ISEP (formerly IEMA) Guide to: Effective Scoping of Human Health in Environmental Impact Assessment (2022)⁴¹³ includes a non-exhaustive list of 21 wider determinants of health associated with the WHO definition, which has been used in identifying the determinants of health to be scoped in and out of the detailed assessment.
- 15.6.4. The ISEP guidance is clear that the EIA Human Health requirement relates to considering the population health effects, including potential inequalities for vulnerable groups. It is the case that several other EIA chapters also include discussion of health in relation to individual, rather than population level, effects. These can include occupational exposures as well as impacts to specific buildings, services or amenities used by people. Relevant chapters include Noise and Vibration, Landscape and Visual, Air Quality, Land and Soils, Socio-economics, Transport and Access, Climate Change and Hydrology and Hydrogeology. The scoping and assessment in relation to these other EIA topic chapters is therefore a relevant input to the Human Health scoping and

⁴¹² <https://www.who.int/about/governance/constitution>

⁴¹³ <https://www.iema.net/media/s35fughe/iema-eia-guide-to-effective-scoping-of-human-health-nov-2022.pdf>

assessment. The Human Health EIA requirement extends the analysis to consider and report on the public health implications.

- 15.6.5. Table 15.3 presents the Human Health matters that are unlikely to give rise to significant effects and which, therefore, are proposed to be scoped out from detailed assessment. Table 15.4 presents the health determinants which are considered to be scoped into the detailed assessment.

Consultation Undertaken to Date

- 15.6.6. No consultation has been undertaken to date for Human Health. Once the scope of the assessment has been agreed, consultation with local stakeholders including the with public health teams in Kent County Council and East Sussex County Council would be undertaken, as well as with national stakeholders such as the UK Health Security Agency (UKHSA) and Department of Health and Social Care Office for Health Improvement and Disparities (OHID)⁴¹⁴.

Likely Significant Effects Scoped Out from Detailed Assessment

Table 15.3 Likely Significant Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Health related behaviours – Risk-taking behaviour	All phases: During all phases of the development, all people based on the Site boundary would be professional workers and all contractors and operators on Site boundary would have strict health and safety protocols enforced. These policies and practices can cover issues including alcohol, cigarettes, non-prescribed drugs, problem gambling and communicable illness.
Health related behaviours – Diet and nutrition (including access to healthy affordable food)	All phases: Whilst the Proposed Development would result in a direct loss of agricultural land, in terms of national food markets and agricultural land availability it represents a small degree of change that is unlikely to be on a scale to significantly affect public health outcomes through the price or availability of affordable healthy food. As it has not been identified that the land affected has a key role in local affordable healthy food markets (e.g. produce underpins the viability of local farmers markets) this determinant is scoped out of the health assessment.
Social environment - Transport modes, access and connections, as well as links	Operation and maintenance: During operation the Proposed Development the minimal additional traffic on roads should not directly reduce any land used for access to local public and key services and facilities and hence is scoped out for the operational phase. Table 15.4 outlines that Transport modes, access and connections are scoped in during the construction and decommissioning phase.

⁴¹⁴ UKHSA and OHID were collectively previously Public Health England.

Potential Effect	Rationale to be Scoped Out
between communities	
Social environment - Community safety	All phases: The BESS would include appropriate design, mitigation and management measures related to risks to population health, including in relation to fire risk, chemical spill risk and electrical hazard. BESS related risks are scoped out of the health assessment on the basis that the Proposed Development, through its design and outline Battery Safety Management Plan, would provide: • appropriate buffer zones and fencing between infrastructure and communities; • sufficient separation between any modular elements of the battery storage (fire breaks); • appropriate provision for fire management and chemical leak containment; • undertaking of a fire risk assessment; appropriate occupational health and safety training; and • resilience measures in relation to accidents and disasters. With these measures in place, BESS risks are unlikely to be of a scale that could pose a risk to public health. Public understanding of these risks is noted and would be assessed under the separate determinant of health 'Public Understanding of Risk'. All phases: All contractors and operators on Site boundary would enforce strict health and safety protocols and working practices to minimise injury risk for both the workforce and the general public (as required by the Health and Safety at Work Act 1974), as well as policies on modern slavery and discrimination. Safe working practices would be secured through the oCEMP, oOEMP and oDEMP, which would be submitted as part of the DCO application. As Site boundary security and safety would be provided through the appropriate use of fencing and CCTV, actual crime and accident risk to the public is therefore scoped out. The potential for widespread actual or perceived crime or influence on community safety that could affect population health are unlikely.
Economic environment - Education and training	All phases (partially scope out): As there would be no change in population as a result of the Proposed Development, there is unlikely to be any significant impact on schools and educational providers, and these issues are scoped out. Table 15.4 outlines that Education and Training is scoped in for all phases with regards to the additional workforce.
Economic environment -	All phases (partially scope out): The Proposed Development is not expected to significantly affect family structures, roles or

Potential Effect	Rationale to be Scoped Out
Employment and income	relationships, by operating appropriate equal employment policies. The supply chain would also be expected to operate appropriate policies related to equality and health and safety, for both workers and the general population. Working conditions can be appropriately managed through health and safety policies and industry best-practice. As such, these issues would be scoped out. Table 15.4 outlines that Employment and Income is scoped in for all phases with regards to the additional workforce.
Bio-physical environment - Climate change mitigation and adaption	Construction and decommissioning: Embodied carbon and other emissions which can alter the climate are not expected to be of a scale during the construction and decommissioning phases where a significant population health impact could occur and hence are scoped out. Table 15.4 outlines that the contribution towards net zero targets to the physical and mental health of populations during the operational phase is scoped in.
Social environment - Housing and access to good quality affordable housing	All phases: The Proposed Development would not result in the loss or provision of any dwellings. No significant or widespread effects on housing availability and affordability are expected. Housing need may be created by the construction and decommissioning workforce, however this is likely to be related to impacts on tourism, which would be assessed in the Socio-Economics EIA topic. Construction and decommissioning phase demand for accommodation is not expected to relate to home ownership, short-term let or rental markets to an extent that significant public health impacts could arise from lack of quality or quantity of housing for existing communities or key workers. Health outcome related housing effects are therefore scoped out. The operational and maintenance workforce is not expected to be on a scale to have the potential to significantly affect housing demand. This issue is also scoped out.
Institutional and built environment - Health and social care services	All phases: On the same basis, as the majority of the workforces are likely to be home-based, healthcare related influences are not considered to be on a scale that could significantly affect public health. This issue is scoped out. The workforces would access healthcare under existing entitlements and primary care registered practices. Normal 111 service triage would apply and on-site first aid would be provide as required by statute. Ambulance coverage for this population in the event of an emergency would remain with the NHS South East Coast Ambulance Service, who cover this home-based population within existing strategic service planning.
Social environment - Relocation	All phases: The Proposed Development does not involve any population displacement or relocation and would not require a widespread compulsory purchase of homes or community facilities. Any individual level effects associated with required land acquisition would not be on a scale to have public health implications.

Potential Effect	Rationale to be Scoped Out
Social environment - Community cohesion, social participation, interaction and support	All phases: The Proposed Development is unlikely to directly affect indoor or outdoor community assets and meeting places, for voluntary, social, cultural or spiritual participation. The preparation of the DCO application would be supported and informed by an extensive programme of community engagement which would seek feedback from all sections of the community and enable all to voice their comments. The community response to visual landscape change is discussed under 'Community identity, culture, resilience and influence' determinant in Table 15.4.
Glint & Glare	All phases: Potential population health effects from Glint & Glare impacts are not within the list of health determinants in the ISEP (formerly IEMA) guidance specifically. However, informed by the rationale in Chapter 19: Glint and Glare, the Proposed Development is not considered to result in reflective effects on a scale that could have significant implications for public health. This includes that, as stated in the scoping-out justification of Chapter 19: Glint & Glare, Solar PV modules are specifically designed to absorb light rather than reflect it. Light reflecting from solar PV modules results in the loss of energy output. Solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors significantly increases electrical energy production of the panels and significantly reduces reflected rays.
Bio-physical environment - Air quality	Operation and maintenance: There would be no significant dust or traffic emissions during the operational phase which would affect air quality. As such, air quality effects are scoped out during the operational phase health assessment. Table 15.4 confirms that for the construction and decommissioning phase, air quality is scoped in.
Bio-physical environment - Water quality or availability	All phases: Chapter 7: Hydrology and Hydrogeology would assess how the Proposed Development affects water resources. Chapter 18: Land and Groundwater has not scoped any potential effects into the assessment in relation to groundwater. The project would adopt standard best practice to minimise pollution risks. It is considered unlikely that water quality or availability would be affected to a degree that could significantly affect public health. This issue is scoped out of the health assessment.
Bio-physical environment - Land quality and use	All phases: Chapter 18: Land and Groundwater would assess how the Proposed Development affects land resources. The project would adopt standard best practice to minimise pollution risk issues. It is considered unlikely that land quality or availability would be affected

Potential Effect	Rationale to be Scoped Out
	to a degree that could significantly affect public health. This issue is scoped out of the health assessment.
Bio-physical environment - Radiation	All phases: Long-standing public health protection exposure limits for electric and magnetic fields (EMFs) are set out by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) 1998 and 2010 publications ^{415, 416} . Compliance with relevant ICNIRP levels is discussed in EN-5 and the Government Code of Practice, 'Power Lines: Demonstrating compliance with EMF public exposure guidelines – a voluntary Code of Practice' ⁴¹⁷ , published in February 2011. As the Proposed Development would comply with these guidelines, the actual risks associated with EMF are scoped out of the health assessment. Public understanding of these risks is noted and would be assessed under the separate determinant of health 'Public Understanding of Risk'.
Institutional and built environment - Built environment	All phases: The Proposed Development would operate appropriate waste management and utilities diversions such that there is not the potential for significant public health effects. These issues are scoped out of the health assessment.
Institutional and built environment - Wider Societal Infrastructure	Construction and decommissioning: Energy generation would not occur during construction and decommissioning phases so no associated public health benefit would arise. This issue is scoped out of the health assessment. Table 15.4 outlines that the contribution towards net zero targets to the physical and mental health of populations during the operational phase is scoped in.

Likely Significant Effects Scoped into the Detailed Assessment

- 15.6.7. The potential effects on wider determinants of health used by ISEP (formerly IEMA), which are considered to be scoped in for detailed assessment are listed in Table 15.4.
- 15.6.8. Where there are effects with a likely negative impact in only a smaller part of the study area and where the effect would be considered scoped out for other areas, this is scoped in and would be highlighted for further consideration at assessment phase. Where potential effects may be deemed to disproportionately or differentially effect certain vulnerable groups compared to

⁴¹⁵ ICNIRP, 1998. ICNIRP Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields (Up To 300 GHz).

⁴¹⁶ ICNIRP, 2010. ICNIRP Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields (1-100 kHz).

⁴¹⁷ Department for Energy and Climate Change, 2012. Power Lines: Demonstrating compliance with EMF public exposure guidelines A voluntary Code of Practice.

the general population, this would form part of the assessment within the scoped-in determinants of health.

Table 15.4 Likely Significant Effects Scoped into the Detailed Assessment

Potential Effect	Rationale to be Scoped In
Health related behaviours - Physical activity (including opportunities for access by walking and cycling, open space, leisure and play)	All phases: Construction works may temporarily disrupt use of PRow, and therefore opportunities for physical activity. Any potential physical impacts associated with active travel would be assessed in the Chapter 12: Transport and Access with mitigation measures secured to minimise disruption. Chapter 11: Landscape and Visual would also consider the impact on landscape amenity and suggested mitigation which could minimise adverse impacts on how these recreational routes are enjoyed and behavioural use. Chapter 15: Human Health would assess the effect of any changes to the PRowS on the ability for the receptors to undertake physical activity during the construction and operation phases, and would cross-reference to the Transport and Access and the Landscape and Visual chapters where appropriate. The Human Health chapter would also assess the scale, if any, and effect of the reduction of publicly accessible land used for physical activity. During operation the Proposed Development is not expected to directly reduce any publicly accessible land used for or access to open space, leisure and play. Whilst long-term access and connections to the natural environment would be maintained, the impact on landscape amenity and associated enjoyment would be considered in Chapter 11: Landscape and Visual with mitigation measures secured to minimise impacts. Consideration during operation is therefore limited to the population health effects associated with PRowS and permissive paths in the vicinity of the Proposed Development, including promoting their use to avoid adverse behavioural change. This would be informed by Chapter 11: Landscape and Visual, which scopes in potential impacts related to changes to views and visual amenity for those engaged in recreation on the King Charles III England Coast Path, Route 2 of the National Cycle Network, and local PRowS. The health scope includes both physical and mental health related outcomes arising from impacts on views and visual amenity on such routes, as well as measures to maintain or improve on (as appropriate and proportionate) equitable access, including for vulnerable groups.
Social environment - Transport modes, access and connections, as well as links between communities	Construction and decommissioning: Construction works such as cable laying or movements by heavy goods vehicles, may temporarily disrupt highways, including of pedestrian and cycle routes along roads. Any potential delay, change to access and safety impacts would be assessed in Chapter 12: Transport and Access and the Human Health chapter would cross-

reference where appropriate. The Human Health chapter would consider the public health implications of any changes in population health related journey times, road safety, accessibility and severance. Opportunities to encourage active travel to work to Site boundary would also be explored.

Transport modes, access and connections in the operational phase have been scoped out (see Table 15.3 above).

Social environment -
Community identity,
culture, resilience and
influence

All phases: The Proposed Development would not result in demographic changes that would strongly influence community identity, nor would it result in long-term changes to lighting, overshadowing and reflections, and the attractiveness of public spaces and buildings. The key change would be the visual landscape of the area, which would be considered in **Chapter 11: Landscape and Visual** with mitigation measures secured to minimise impacts. The Human Health chapter would cross-reference to the Landscape and Visual chapter where appropriate to explain the public health implications of visual change, including on mental wellbeing outcomes. The health assessment conclusions would also have regard as appropriate to linked assessments, including **Chapter 10: Built Heritage**, in relation to potential impacts on cultural assets that contribute to sense of place.

Economic
environment -
Education and training

All phases: Through all phases of the Proposed Development, there would be opportunities to improve educational and skills attainment of the workforce, which may be targeted at vulnerable or priority groups.

The health assessment would explore how the Proposed Development is an opportunity to educate the general public about renewable energy generation, for example by holding open days and information display boards around the Site boundary, and educational outreach with schools and other organisations.

The Human Health chapter would assess the effect of education and training opportunities on the health of vulnerable groups. Any effect on schools and educational providers is scoped out in Table 15.3.

Economic
environment -
Employment and
income

All phases: The Proposed Development would provide direct and indirect opportunities for good quality employment, which can be particularly beneficial for some vulnerable or priority groups. This would be during all phases of development and outlined in **Chapter 16: Socio-Economics**, albeit the greatest impacts would be expected during construction. The Human Health chapter would cross-reference to **Chapter 16: Socio-**

	Economics where appropriate. The Human Health chapter would assess the effect of improving employment opportunities and income on the health of vulnerable groups. As appropriate this would include indirect effects related to diversification of agricultural land and growth of rural businesses, as assessed in Chapter 16: Socio-Economics.
Bio-physical environment - Climate change mitigation and adaption	Operation and maintenance: Chapter 13: Carbon and Climate Change would assess how the Proposed Development responds to the challenges of climate change which would affect current and future global populations. The Human Health chapter would cross-reference to Chapter 13: Carbon and Climate Change where appropriate. During the operational phase the renewable energy generated would assist in transitioning towards net zero. The Human Health chapter would assess how the contribution towards net zero targets affects the physical and mental health of receptors during the operational phase, linking this with the 'Wider Societal Infrastructure' health determinant. Table 15.3 outlines that Climate Change Impacts would be scoped out for the construction and decommissioning phases.
Bio-physical environment - Air quality	Construction and decommissioning: There could be localised dust and construction traffic emissions during the construction phase. Chapter 17: Air Quality would assess how the Proposed Development would affect local air pollution, including opportunities to contribute to maintaining a good standard of air quality and setting out mitigation measures. The Human Health chapter would assess the effect of emissions on health of the identified receptors during the construction phase and would cross-reference to Chapter 17: Air Quality where appropriate. Table 15.3 outlines that air quality effects are scoped out during the operational phase health assessment.
Bio-physical environment - Noise and vibration	All phases: Chapter 14: Noise and Vibration would assess how the Proposed Development could affect the existing sound environment and have associated impacts during construction and operation. The Human Health chapter would assess the effect of noise and vibration on the health of the identified receptors (including mental wellbeing) and would cross-reference to Chapter 14: Noise and Vibration where appropriate.
Public understanding of risk	All phases: Responding to the potential for some members of the public to feel uncertainty or concern about some aspects of the Proposed Development, in line with good practice, a Public Understanding of Risk health determinant is scoped in. The assessment would consider where, notwithstanding that the actual risks would be appropriately controlled to meet public

health protection standards, community concern may still arise and potentially result in adverse effects on localised populations' mental health and wellbeing. Issues to be considered under this health determinant include BESS safety, electro-magnetic fields (EMF) exposures, and perceptions of crime.

Institutional and built environment - Wider Societal Infrastructure

Operation and maintenance: The Proposed Development would contribute towards energy security by generating the energy which society depends on for good population health. A reliable supply of renewable electricity is required in relation to numerous societal factors such as food production and safety, thermal comfort, healthcare, education, income generation and maintaining social networks. These are important prerequisite for public health and reducing health inequalities. Given the scale of the contribution to renewable energy security and the national population reached via national grid distribution, these benefits are potentially significant and are scoped into the Human Health chapter.

15.7. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 15.7.1. The detailed assessment in **Chapter 15: Human Health** would first establish a more detailed baseline position of the population's health, inequalities and demographic profile of the Site boundary-specific and local population, including local health priorities and public health trends (e.g., via the Health and Wellbeing Strategies, and relevant JSNAs). This would build on information included in this scoping chapter.
- 15.7.2. Published health data within the public domain would be collated from sources such as the Office for Health Improvement and Disparities (OHID), Office for National Statistics (ONS), the relevant local authorities, the NHS and other recognised sources or through community engagement and liaising with key stakeholders such as local public health teams in the county and district Local Authorities.
- 15.7.3. The baseline health profile would focus on relevant physical and mental health indicators, socio-economic and labour market conditions. It would also consider feedback relating to health and wellbeing matters received through the statutory and non-statutory community engagement process. This process of collating and reviewing relevant baseline data would enable vulnerable groups to be identified.

Construction, Operation and Maintenance and Decommissioning

- 15.7.4. The same approach would be taken across construction, operation and decommissioning phases. The detailed assessment would examine the potential effects of the Proposed Development on public health outcomes in the identified populations.
- 15.7.5. The Human Health assessment would use the approach and criteria for sensitivity magnitude and significance from the ISEP (formerly IEMA) Guidance 'Determining Significance for Human Health in Environmental Impact Assessment'⁴¹⁸.
- 15.7.6. The Human Health assessment would be informed by the conclusion of other technical assessments and chapters of the ES, in particular: air quality, noise and vibration, landscape and visual, socio-economic and transport and access.
- 15.7.7. The health effects would be assessed in the context of the baseline position, as well as the nature and context of the Proposed Development impacts, taking account of the sensitivity of the relevant population (with sensitivity conclusions in relation to both the general population and vulnerable group sub-population for the relevant study areas).
- 15.7.8. The impacts of the Proposed Development would be identified as 'beneficial', 'neutral' or 'adverse' and defined as follows:
- Beneficial - A positive and/or advantageous impact;
 - Neutral - No discernible impact; or
 - Adverse - A negative and/or disadvantageous/ detrimental impact.
- 15.7.9. The effects would then be defined as 'significant' or 'not significant' guided by the assessment of magnitude and sensitivity and professional judgment that takes into account relevant public health evidence and context. The impact significance matrix set out in Table 15.5 would be used to inform the professional judgement on the significance of each effect. This significance matrix aligns with the ISEP (formerly IEMA) Guide to: Determining Significance for Human Health In Environmental Impact Assessment (2022)³⁹⁴.

⁴¹⁸ Pyper, R., Waples, H., Beard, C., Barratt, T., Hardy, K., Turton, P., Netherton, A., McDonald, J., Buroni, A., Bhatt, A., Phelan, E., Scott, I., Fisher, T., Christian, G., Ekermawi, R., Devine, K., McClenaghan, R., Fenech, B., Dunne, A., Hodgson, G., Purdy, J., Cave, B. (2022) IEMA Guide: Determining Significance for Human Health in Environmental Impact Assessment.

Table 15.5 Magnitude and Sensitivity Table

Magnitude	Sensitivity				
		High	Moderate	Low	Very Low
	Major	Major (Significant)	Major – Moderate (Significant)	Moderate - Minor (Significant)	Minor - Negligible
	Moderate	Major – Moderate (Significant)	Moderate (Significant)	Minor	Minor - Negligible
	Minor	Moderate - Minor (Significant)	Minor	Minor	Negligible
	Negligible	Minor - Negligible	Minor - Negligible	Negligible	Negligible

- 15.7.10. Where a potential public health effect is identified, enhancement and mitigation measures would be explored to either enhance or secure a significant positive effect or mitigate against a significant negative effect. Mitigation measures can include design or non-design related measures and actions. Monitoring of effects would be secured where appropriate. Typically monitoring is only appropriate in relation to a significant adverse effect conclusion or mitigation relied on to avoid a significant adverse effect conclusion.
- 15.7.11. The assessment would then determine the in-combination (intra-project) effects through further analysis of the geographic and temporal relationship between health effects. All identified effects (excluding negligible effects) would be collated for each study area population (e.g. all those that relate to the Study area) to produce a list of relevant determinants of health and their level of effect. A narrative would be provided of likely interactions and describe the need for any further mitigation necessary.
- 15.7.12. The assessment would also determine cumulative (inter-project) effects. A list of relevant reasonably foreseeable cumulative projects would be identified as relevant to the Human Health study areas and health determinants. A narrative would provide a combined level of effect to reflect the likely implications for public health, including any further mitigation necessary. Further information is presented in **Chapter 5: Approach to EIA**.

Assumptions and Limitations

- 15.7.13. It should be noted that the boundaries of the aforementioned impact areas may be adjusted for certain receptors depending on:
- The availability of data (e.g. OHID public health data is not available for LSOAs and therefore data from the relevant electoral wards would be utilised);

- Alignment with other technical assessments within the EIA and DCO application (e.g. Air Quality Assessment or the Noise and Vibration Assessment).

- 15.7.14. The identified impact areas and scale would be highlighted throughout the assessment, along with the relevant data sources, assumptions and limitations. The latest available data would be used; however, it should be noted that many data sources are frequently updated and could be subject to change from the time of drafting or during the DCO process.
- 15.7.15. Given that the health assessment would rely strongly on the other, specific assessments and chapters of the ES, the health assessment would therefore carry through any assumptions, limitations and uncertainties from those individual assessments.

16. Socioeconomics

16.1. Introduction

- 16.1.1. This Chapter of the Scoping Report presents the scope of detailed environmental assessment for socio-economic likely significant effects for the Proposed Development. In particular this section presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It concludes by setting out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.

16.2. Review of Policy, Legislation, and Relevant Guidance

- 16.2.1. Legislation, planning policy and guidance relating to socio-economic effects and relevant to the Proposed Development comprise:

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)⁴¹⁹; specific reference to Section 5.13, which relates to Socio-Economics;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)⁴²⁰ – specific reference to section 2.10 on the role of solar PV in meeting net zero targets and the associated impacts that may need to be assessed;
- National Policy Statement for Electricity Networks Infrastructure (EN-5) (2023)⁴²¹ – provides general advice on issues that need consideration (such as noise and landscape and visual impact), and which may indirectly affect socio-economics; and
- National Planning Policy Framework (NPPF) (updated February 2025)⁴²² – specific reference to Section 6: Building a strong, competitive economy, Section 12: Achieving well designed places; Section 14 meeting the challenge

⁴¹⁹ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

⁴²⁰ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

⁴²¹ Department for Energy Security and Net Zero (2023), National Policy Statement for Electricity Networks Infrastructure (EN-5), available at: <https://assets.publishing.service.gov.uk/media/65a78a5496a5ec000d731abb/nps-electricity-networks-infrastructure-en5.pdf>

⁴²² Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

of climate change, flooding and coastal change and Section 15: Conserving and enhancing the natural environment.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)⁴²³, specifically Policy CC6 ‘Solar Farms’;
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)⁴²⁴; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)⁴²⁵.

National Guidance

- Institute of Sustainability and Environmental Practitioners (ISEP) (2025) Social Impact Assessment in Environmental Impact Assessment in the UK⁴²⁶.
- This scoping report has also been prepared with regard to the principles in: HM Treasury (2022) The Green Book: Central Government Guidance on Appraisal and Evaluation⁴²⁷; and
- Homes and Communities Agency (2014). The additionality guide, fourth edition⁴²⁸.

Local Guidance

- The authors are not aware of any local guidance to the assessment of socio-economic effects in Environmental Impact Assessment (EIA). However, one of the five objectives in the Folkestone and Hythe District Council’s Corporate Plan⁴²⁹ is to “grow the economy”, including taking advantage of growing sectors such as green technology and eco-tourism. The Plan’s ambitions include to:

⁴²³ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

⁴²⁴ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

⁴²⁵ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

⁴²⁶ Institute of Sustainability and Environmental Practitioners (ISEP) (2025) Social Impact Assessment in Environmental Impact Assessment in the UK. <https://www.isepglobal.org/resources/blogs/2025/october/isep-launches-new-guide-on-social-impact-assessment/>

⁴²⁷ HM Treasury (2022) The Green Book: Central Government Guidance on Appraisal and Evaluation <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>

⁴²⁸ Homes and Communities Agency (2014) the additionality Guide, fourth edition https://assets.publishing.service.gov.uk/media/5a7ec4b9e5274a2e87db1c92/additionality_guide_2014_full.pdf

⁴²⁹ Folkestone and Hythe District Council, Corporate Plan (undated). Available at: <https://www.folkestone-hythe.gov.uk/policies-plans-documents/corporate-plan/5>

- promote apprenticeships, training and job opportunities - particularly in growing industries that would help deliver a sustainable future;
- Support projects that encourage people to spend locally, particularly with the council's own schemes and projects where they partner with other organisations;
- Work in partnership to promote the district as a location for green technologies, high-tech, creative and tourist enterprises; and
- Support clean methods of generating energy (e.g. at Dungeness) that respect our protected landscapes and habitats.

16.3. Existing Baseline Conditions

- 16.3.1. This section sets out the known baseline conditions at this (scoping) stage of the project. It is noted that a further survey and assessment is proposed to inform the technical assessment for the Environmental Statement (see Section 16.7).

16.4. Study Area

- 16.4.1. The potentially likely significant effects of the Proposed Development would be assessed against a baseline scenario, considering social and economic conditions at different spatial levels, how these have changed over time and where relevant where they are expected to change over time. Those used in the baseline set out below are:
- **Site:** the area within the order limits itself (where relevant data are available);
 - **Local Area:** comprising several Super Output Areas (SOAs). These are small areas for which published socio-economic data are available. The Site boundary itself forms part of several SOAs, hence this area is somewhat larger than the Site boundary. Whilst published socio-economic data for small areas is prone to a greater margin for error than larger areas, it is generally a good approximation of socio-economic characteristics. Note published data at SOA level is limited in some respects (such as labour market data), hence it may be necessary to use data from a slightly larger area, based on lower level super output areas (LSOA) in the assessment itself;
 - **Districts:** the Site boundary largely lies within Folkestone and Hythe District Council administrative boundary but also includes a small area within the Rother District Council administrative boundary;
 - **Region:** The South East of England; and
 - **National:** Great Britain, England, or England and Wales depending on the dataset used.

Approach to the Collection of Baseline Data for Scoping

16.4.2. Baseline socio-economic data was collected via a desktop search on several issues:

- Demographic characteristics and trends as well as those on the local economy, employment, labour market; housing and relative socio-economic “deprivation”; and
- These data are taken from the 2021 Census⁴³⁰; the Labour Force Survey⁴³¹; Annual Population Survey⁴³²; Business Register and Employment Survey⁴³³ all of which are published by the Office for National Statistics on “Nomis”⁴³⁴.

Relevant Baseline Conditions for Scoping

16.4.3. The Site boundary itself comprises six separate land parcels of different sizes (See **Figure 2.2 within Appendix E**). The largest parcel, South Brooks A, is located approximately 1 km to the West of Lydd with South Brooks B, C and D to the north, northeast and east of the town respectively. South Brooks E is located further to the Southeast of Lydd. The Site boundary comprises agricultural fields, along with one area of brownfield land (South Brooks F) which is located within the MoD Lydd Ranges.

16.4.4. The Site boundary forms part of five Output Areas (OAs)⁴³⁵. These are: E00124518, E00124524, E00124604, E00124606 in Folkestone and Hythe and E00107184 in Rother (these are presented in **Figure 16.1 within Appendix E**). Hereafter this is referred to collectively as the ‘Local Area’⁴³⁶.

⁴³⁰ Office for National Statistics (2011) 2011 Census. Available:

<https://www.ons.gov.uk/census/2011census/2011censusdata>

⁴³¹ Office for National Statistics (2022) Labour Force Survey. Available:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/methodologies/annualpopulationsurveyapsqmi>

⁴³² Office for National Statistics (2022) Annual Population Survey. Available:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/methodologies/annualpopulationsurveyapsqmi>

⁴³³ Office for National Statistics (2022) Business Register and Employment Survey. Available:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/methodologies/annualpopulationsurveyapsqmi>

⁴³⁴ Office for National Statistics (2023) Nomis. Available: <https://www.nomisweb.co.uk/>

⁴³⁵ Output Areas (OAs) are the lowest level of geographical area for census statistics and were first created following the 2001 Census. Each OA is made up of between 40 and 250 households and a usually resident population of between 100 and 625 persons and may change after each census.

⁴³⁶ Note that some data are not published at SOA level, where unavailable socio-economic data would be analysed at lower level super output area (LSOAs) level. LSOAs are made up of groups of Output Areas (OAs), usually four or five. They comprise between 400 and 1,200 households and have a usually resident population between 1,000 and 3,000 persons.

- 16.4.5. Unless stated otherwise, all information in the following section is taken from the Nomis Labour Market Profiles for Folkestone and Hythe⁴³⁷ and Rother⁴³⁸. These profiles refer to several data sets, noted in footnotes.
- 16.4.6. According to the 2021 Census, the resident population of the Local Area was approximately 1,640 people⁴³⁹. That of the wider Folkestone and Hythe District area was 110,040 in 2021, having increased by 1.7% from 108,199 in 2011. The population of Rother also increased over the same period by 3.0% from 90,729 in 2011 to 93,409 in 2021⁴⁴⁰. This compares to faster growth in the wider South East of 7.4% and 5.9% across Great Britain in the same period. On this basis, the population of the Local Area comprised about 1.5% the population of Folkestone and Hythe and about 0.8% of both Districts combined.
- 16.4.7. According to data from April 2024 to March 2025, the proportion of the population of working age (i.e. 16-64) was lower in both Folkestone and Hythe (64,300, or 58.4%), and particularly Rother (49,400, or 52.9%) than the South East (61.9%) and Great Britain (62.9%). In contrast, the economic activity rates of those aged between 16-64 in Folkestone and Hythe at 84.2% was higher than regionally (81.1%) and nationally (78.5%). The opposite was true in Rother (some 69.5%)⁴⁴¹. Self-employment rates in both Districts (18.5% in Folkestone and Hythe and 13.7% in Rother), were also noticeably above regional (10.0%) and national rates (9.4%).
- 16.4.8. In the same period, the unemployment rate (i.e. number of people aged 16 and over who are economically active but not in employment) in Folkestone and Hythe and in Rother was 3.5% and 3.4%, respectively. This is similar to regional (3.3%) and Great Britain rates (3.9%). Economic inactivity rates more generally stood at some 10,000 (15.8%) in Folkestone and Hythe but 16,000 (or 30.5%) in Rother (of those some 6,800 (just over 40%) were recorded as long-term sick). Regional rates were 18.9% and across Great Britain, 21.5% in the same period⁴⁴².
- 16.4.9. Claimant count unemployed (i.e. those out of work, seeking it and in receipt of universal credit to support that search) amounted to 2,575 in Folkestone and Hythe and 1,600 in Rother (June 2025). Locally, claimant count percentage

⁴³⁷ Nomis Labour Market Profile, Folkestone and Hythe, available at:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157318/report.aspx#supply>

⁴³⁸ Nomis Labour Market Profile, Rother, available at:
<https://www.nomisweb.co.uk/reports/lmp/la/1946157298/report.aspx>

⁴³⁹ Office of National Statistics, 2021 Census TS001 - Number of usual residents in households and communal establishments

⁴⁴⁰ Source: ONS midyear population estimates taken from Nomis Labour Market Profile, Rother.

⁴⁴¹ Source: ONS Population estimates - local authority based by five-year age band taken from Nomis 2021 Labour Market Profile, Rother.

⁴⁴² Source: ONS Annual Population Survey, taken from Nomis Labour Market Profile, Folkestone and Hythe. Economic Inactivity relates to people who are neither in employment nor unemployed. This group includes, for example, all those who were looking after a home or retired. See:

<https://www.nomisweb.co.uk/reports/lmp/la/1941962885/report.aspx?town=folkestone#supply>

rates are not available⁴⁴³, but stood at 3.2% regionally and 4.1% across Great Britain.

- 16.4.10. In terms of qualification levels in 2024, 39.5% of working age residents in Folkestone and Hythe had a qualification at degree-level or above (i.e. Registered Qualifications Framework (RQF) 4 or higher). This was lower than the South East (48.2%) and Great Britain averages (47.2%). The figure for Rother stood at 26.9%. In contrast, the percentage of the working age population with qualifications at RQF1 and above in Folkestone and Hythe (85.9%) was lower than the South East (90.8%) and Great Britain (88.9%). The rate in Rother was above the national average at (89.6%). Average earnings are somewhat lower in both districts than average regional and national rates.
- 16.4.11. Total employee jobs in Folkestone and Hythe (2023) were 36,000, of which some 66% were full time jobs; a similar proportion to regionally (67.7%) and across Great Britain (68.8%). The number in Rother was 33,000, with part time work playing a greater role (39.4%) compared to regionally (32.3%) and Great Britain (31.2%)⁴⁴⁴.
- 16.4.12. Industries employing the largest number in *Folkestone and Hythe* as of 2023 are human “health and social work” activities and “wholesale and retail trade; repair of motor vehicles and motorcycles” (both 5,000, or 13.9% of jobs). This was broadly similar to the proportion employed in these sectors regionally (between 14.0-15.0%) and across Great Britain (13.7%-13.9%). Those employed in accommodation and food service activities amounted to 4,500. At 12.5%, this was more prominent than the regional rate (8.6%) and that across Great Britain (8%). The same applies to “Public administration and defence; compulsory social security” which employed 3,500 (or 9.7%) in the District, around double or more the proportion in the wider South East (3.5%) and in Great Britain (4.7%). This is likely to reflect activities at or related to the Dungeness A and B Nuclear Power Station. In *Rother*, some similar patterns are evident, but accommodation and food services employed a notably higher numbers (8,000 people, or (24.2%) as of 2023. Construction in Rother employed 1,750 people (5.3%) and some 2,000 in Folkestone and Hythe (5.6%). This is slightly above regional 4.9%) and national (4.8%) rates.
- 16.4.13. According to the 2021 census area profiles, Folkestone and Hythe⁴⁴⁵ had 48,338 households; 75% of these were houses, 15% are purpose-built flats, and 10% are other (mainly converted or shared houses including bedsits). Of

⁴⁴³ Note, under Universal Credit a broader span of claimants is required to look for work than under Jobseeker's Allowance. As Universal Credit Full Service is rolled out in particular areas, the number of people recorded as being on the Claimant Count is therefore likely to rise.

⁴⁴⁴ Source: ONS Business Register and Employment Survey: open access taken from Nomis Labour Market Profile, Folkestone and Hythe.

⁴⁴⁵ Source: Nomis Labour Market Profile, Folkestone and Hythe, available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=E07000112,E12000008,E92000001>

Rother's⁴⁴⁶ 42,102 dwellings, 77.8% were houses, 14.2% flats, and 7.9% other. In England as a whole, 77.4% of residential properties were houses, 17.1% were flats and 5.5% were other types.

- 16.4.14. According to the 2025 English indices of deprivation⁴⁴⁷, Folkestone and Hythe is the 66th most deprived out of the 296 Local Authority Districts by average rank. Rother is the 93th most deprived by average rank.
- 16.4.15. Using the UK small area GVA estimates⁴⁴⁸, GVA in Folkestone and Hythe in 2022 (the most recent year for which data is available) was £2,273 million, compared to £1,559 million in Rother.
- 16.4.16. A number of studies have examined the tourism industry locally. Some 500 tourism enterprises, comprising 13.4% of those across Kent, were estimated to be in Folkestone and Hythe in 2024. This had increased by 2% from the previous year and by 4.2% over the previous five. Of these tourism enterprises, some 50 were estimated to be associated with accommodation for visitors; 325 with food and beverage serving activities; 30 with passenger transport/vehicle hire and 95 with cultural, sport, recreational and conference activities⁴⁴⁹. Both Folkestone and Hythe and Rother District Councils publish reports and statistics on the number of visitors, associated expenditure and employment which is derived via Tourism to the Districts^{450 451}.
- 16.4.17. In terms of visitor/tourism attractions and facilities in the vicinity of the Site boundary, based on an initial desktop review (which is visualised in **Figure 16.2 within Appendix E**) these comprise:
- Dungeness Beach; a stretch around the peninsular to the east and west of the Dungeness A and B Nuclear Power Station;

⁴⁴⁶ Source: Nomis Labour Market Profile, Rother, available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=E07000064,E12000008,E92000001>

⁴⁴⁷ Source: HM Government (2025) English indices of deprivation, available at:

<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025/english-indices-of-deprivation-2025-statistical-release>

⁴⁴⁸ Source: NOMIS (2022), UK Small Area GVA estimates, available at:

<https://www.nomisweb.co.uk/Query/Asv2Xls?Excel2007=yes&>

⁴⁴⁹ Kent Analytics, Statistical Bulletin, January 2025. Tourism Industry in Kent, available at:

https://www.kent.gov.uk/_data/assets/pdf_file/0020/105743/Tourism-Industry-in-Kent-report.pdf

⁴⁵⁰ See for example: Destination Research (undated), Economic Impact of Tourism 2023, Folkestone and Hythe – 2023 Results. Available at: <https://www.visitkentbusiness.co.uk/media/117893/economic-impact-of-tourism-folkestone-hythe-2023.pdf> and Rother District Council (undated). Tourism Stats, Strategies and Surveys. Volume, Value and Economic Impact of Tourism to Rother. Available at:

<https://www.rother.gov.uk/business/support-and-advice/accommodation-start-up-pack/tourism-stats-strategies-and-surveys/#:~:text=0.5%20million%20overnight%20visits,the%20local%20economy%20every%20month>

⁴⁵¹ Visit Britain also publish hotel occupancy data, nationally and by region, with data on occupancy for each month across the year. The latest report is July 2025. See Visit Britain, England Occupancy Survey, July 2025 Results. Available at: <https://www.visitbritain.org/research-insights/england-hotel-occupancy-latest>

- Greatstone Beach; a stretch further to the north around the peninsular between the town of Lydd-on-Sea and toward the settlement of Greatstone;
- Galloways Beach; a stretch further west between Dungeness A and B Nuclear Power Station and the town of Camber;
- The Dungeness National Nature Reserve, to the north of the Dungeness A and B Nuclear Power Station and to the Southeast of the Site boundary. This comprises both the nature reserve allocation itself but also a visitor facility operated by the Royal Society for the Protection of Birds (RSPB), with various viewing platforms/bird boxes and a car park;
- A series of public houses/cafes:
 - The Britannia Inn, to the east of Dungeness A and B Power Station;
 - The Pilot Inn, further north, off Dungeness Beach;
 - The Rose and Crown in Old Romney;
 - Oasis Café in Old Romney;
 - A small number of cafes, restaurants, take aways and further pubs in Lydd, Lydd on Sea and Greatstone;
- Romney Sands Campsite, part of the built-up area between Greatstone and Lydd-on-Sea to the east of the Site boundary;
- Romney Meadows Caravan and Campsite, adjacent to South Brooks B;
- Jessamine Farm Caravan and Campsite, so the South of the A259 in Old Romney;
- Orca Campsite, off Lydd Road to the Southwest of Jurys gap and the Site boundary;
- Lydd Golf Club, immediately to the North of the Lydd Airport, itself to the South of South Brooks C and East of South Brooks D;
- Lydd Speedway, a motorbike racetrack, located to the north of Lydd Airport and east of the Lydd Golf Club;
- Bungalow Lake and fishing club, to the South of South Brooks A;
- Lydd Model Flying Club, an area for the flying of model aeroplanes located to the east of the South Brooks A;
- Several facilities around three small lakes/gravel pits:
 - Action Watersports, providing aqua sports and a seasonal inflatable aqua park on the lake adjacent to Dengemarsh Road;
 - Windsurfing activities are also provided in the gravel pit to the south east. Both boundaries are adjacent to South Brooks E;
 - Lydd Karting track, located immediately to the West of Aqua Water Sports, on land between the lakes;

- Herons Park Campsite, wedding and event venue, fishing and residential properties, to the South of the go karting track; and
- Lydd Water Ski Club, adjacent to the Herons Park Site boundary.

16.4.18. There are a number of Public Rights of Way (PRoW) which pass through or close to the Site boundary. **Figure 16.3 within Appendix E**, taken from Kent County Council PRoW map and details from East Sussex County Council, which shows footpaths, restricted byways, and bridleways in the Local Area.

Important Receptors Identified

16.4.19. Socio-economic effects are felt by people; individually, in households, places of work, leisure / recreation and by communities. The size of community impacted differs based on the nature and scale of effect, its duration and on local characteristics. Most effects are likely to be felt at local and/or at District level. Where relevant, baseline data and potential effects at regional and national levels would also be examined.

16.4.20. Specific groups and areas likely to be affected are:

- **Residents**, primarily those in the Local Area but also in the two Districts.
- **Employees** (i.e. people who are already in work) as well as those who are **currently unemployed** in the Local Area and the two districts. Potentially some employees may be from further afield if the Proposed Development needs specialist labour and/or there is demand for greater numbers than the local labour market can provide.
- **Businesses** (i.e. employers) in the Local Area and the two Districts.
- **Visitors** to the Local Area for leisure/recreation or tourism.

16.5. Environmental Measures

16.5.1. Opportunities to introduce environmental measures that would avoid or reduce the potential for an adverse significant effect to occur would be considered. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to socio-economics would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures would be implemented and included within the Proposed Development:

- Consideration of good design principles for construction and decommissioning phases of the Proposed Development as well as during operation. These would be reflected in a Design Approach Document (DAD) which would be submitted as part of the DCO application;

- An outline Construction Environmental Management Plan (oCEMP) which sets out the overall approach and specific measures to minimise adverse and maximise beneficial effects during construction. Outline Operational and Decommissioning Environmental Management Plan (oOEMP) would also be produced;
- An outline Landscape and Ecology Management Plan (oLEMP) would set out measures to retain, protect and enhance ecology and habitats.
- An outline Construction Traffic Management Plan (oCTMP) would set out measures to minimise any disruption from construction traffic, including traffic generated by employee travel;
- An outline Public Right of Way (PRoW) Management Plan (oPROWMP) would set out measures to protect, retain enhance or temporarily relocate PRoW for footpath and bridleway users; and
- Actions to maximise local employment and skills benefits would be set out in an outline Skills Supply Chain and Employment Management Plan (oSSEMP).

16.5.2. Opportunities to enhance beneficial socio-economic effects may include:

- Contribution to the skills needed for the UK's transition to Net Zero, including targeted activities to support local recruitment, employment and training opportunities for relevant construction, operation and decommissioning trades as well as procurement via local supply chains, where feasible;
- Contribution to the development of low-carbon industries at the local and regional level as well as nationally;
- Provision of predictable, non-seasonal income source for landowners of plots within the Site boundary. This may support farm diversification and wider business planning; and
- The optimisation of land use, with potential dual use of land for the Proposed Development alongside agriculture.

16.6. Scope of the Assessment

Consultation Undertaken to Date

16.6.1. No consultation has been undertaken to date for socio-economics. Once the scope of the assessment has been agreed, consultation with local stakeholders including the two Local Authorities would be undertaken.

Effects Scoped Out from Detailed Assessment

16.6.2. Table 16.1 presents the socio-economic matters that are unlikely to give rise to significant effects and, therefore, which are proposed to be scoped out from detailed assessment. The list of social determinants (potential effects) is drawn from that set out in the ISEP 2025 guidance⁴²⁶.

- 16.6.3. It is recognised that socio-economic effects are closely linked to various effects on amenity – particularly Landscape and Visual Impacts, Noise, Air Quality and Traffic and Transport. These are to be assessed separately in specific chapters which would be cross referenced in the assessment. Similarly, potential effects on health, including on local people⁴⁵² is considered in a dedicated chapter.
- 16.6.4. A central socio-economic benefit of the Proposed Development is the contribution to net zero targets, to any associated reduction in GHG emissions as well as the supply of renewable energy over its operational lifetime. This is covered in a specific chapter on climate effects.
- 16.6.5. Potential effects of the Proposed Development on the supply of agricultural land, including best and most versatile land, forms a separate chapter and would not be covered here. Any resulting employment effects, however, would be covered.

Table 16.1 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Socio-economic conditions as a social determinant	
Social change due to impact on upskilling and training.	<i>All phases:</i> Whilst the Proposed Development would include workforce training and upskilling, it is likely that the majority of workers would have existing experience and qualifications appropriate to their roles. The expectation is that apprenticeships and upskilling would not be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.
Housing as a social determinant	
Social change due to impact on homes or accommodation quality, supply, price or access.	<i>Operation and maintenance:</i> The extent of any change in demand for accommodation during operation is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.
Social change due to impact on relocations or temporary housing.	<i>All phases:</i> No relocations or new temporary accommodation are expected on a scale that could significantly affect community social outcomes. This social determinant is scoped out.
Social change due to impact on spatial planning and zoning.	<i>All phases:</i> Whilst the Proposed Development affects land use, it does not change spatial planning or zoning designations in relation to current or future housing on a scale that could significantly affect

⁴⁵² See Chapter 15: Human Health with regards to the Study Area

community social outcomes. This social determinant is scoped out.

Infrastructure as a social determinant

Social change due to impact on public & social services (e.g. health & education).

All phases: The effects of the Proposed Development on school places, health services such as GP provision are not expected to result in a significant permanent increase in the local population; thus, demand should not be affected on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on local community facilities (e.g. halls) and their financial revenues.

All phases: No direct or indirect impacts to community facilities are expected on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on public utilities (e.g. water or energy supplies).

All phases: No direct or indirect impacts to public utilities are expected on a scale that could significantly affect community social outcomes. Any diversions would be managed in accordance with standard good practice and discussion with relevant providers and service users. This social determinant is scoped out.

People as a social determinant

Social change due to impact on migration or demographic change (including presence of temporary workforces or gentrification).

All phases: The Proposed Development is not expected to result in either temporary or permanent changes in the local population and its demographic structure to an extent that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on people's capacities to engage in society linked to levels of health, education, skills, care responsibilities or human rights.

All phases: The Proposed Development is not expected to change the underlying capacities, rights or statuses of the affected communities such that they would significantly change their degree of engagement with society. Human rights are appropriately and separately protected by the regimes set out in the Human Rights Act 1998. This social determinant is scoped out.

Social change due to impact on people's outlook (public understanding), including aspirations, fears, expectations and anxieties.

All phases: Whilst there would likely be a degree of concern and uncertainty about the Proposed Development, as well as positive aspiration and expectations, there would also be a high degree of information provided by the Proposed Development through the application process. As information would be provided and consultation undertaken, any change in community outlook is unlikely to be on a scale that

could significantly affect community social outcomes. This social determinant is scoped out. This issue is appropriately considered in the Human Health EIA topic under the 'public understanding of risk' health determinant.

Connectedness of community as a social determinant

Social change due to impact on community cohesion, severance and social networks.

All phases: Whilst the Proposed Development affects a small number of routes, there is not expected to be disruption to community social networks or cohesion on a scale that could significantly affect community social outcomes. This social determinant is scoped out. This issue is appropriately considered in the Human Health EIA topic under the 'community identity' health determinant.

Social change due to impact on community interactions linked to safety, hazards, security and crime.

All phases: The management plans associated with the Proposed Development, and secured through its determination, would appropriately respond to issues of safety, hazards, security and crime e.g. fencing and unintrusive lighting and CCTV. Any change is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on volunteering and inter-generational participation, including linked to empowerment and representation in decision-making.

All phases: No impacts on volunteering or intergenerational participation are expected. Any change would not be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Culture as a social determinant

Social change due to impact on cultural identity, including linked to buildings, structures and events.

All phases: This issue is appropriately assessed through the archeology and built heritage EIA topics. Any impact on cultural identity is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on place identity, including wider cityscape, seascape or landscape aesthetics.

All phases: This issue is appropriately assessed through the landscape and visual EIA topic. Any impact on place identity is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on minority languages protected in

All phases: No impacts on minority languages are expected. This social determinant is scoped out.

policy, e.g. Gaelic, Cornish or Welsh.

Nature as a social determinant

Social change due to impact on biodiversity and natural capital affecting experiences of wildlife and natural habitats.

All phases: This issue is appropriately assessed through the biodiversity EIA topic. Any impact on experiences of wildlife and natural habitats is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on community gardens and parks (quantity, quality and access) affecting attitudes to and levels of engagement with nature.

All phases: The Proposed Development is not expected to result in direct or indirect impacts to community gardens or parks to an extent that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on natural resource availability, or traditional knowledge, relating to local farming, growing, foraging or freshwater.

All phases: Any impacts on natural resource availability to communities is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out. Potential impacts to best and most versatile (BMV) agricultural land are set out in **Chapter 8: Agricultural Soils**.

Living environment as a social determinant

Social change due to impact of pollution or nuisance affecting the quality of the local living environment.

All phases: This issue is appropriately assessed through the noise and vibration, air quality, hydrology and hydrogeology and land and groundwater EIA topics. Any impact on the local living environment is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Social change due to impact on wider living environment quality due to climate change or the circular economy.

All phases: This issue is appropriately assessed through the carbon and climate change EIA topic. Any impact on place identity is not expected to be on a scale that could significantly affect community social outcomes. This social determinant is scoped out.

Likely Significant Effects Scoped into the Detailed Assessment

16.6.6. Potential socio-economic effects that would be further considered in terms of **employment** are:

- Additional temporary direct employment opportunities during the construction and decommissioning phase of the Proposed Development and additional permanent employment opportunities during the operational phase of the

Proposed Development. The number of new jobs created as a direct result of the Proposed Development would be assessed, based on estimates from the Applicant, derived from estimates of the investment value of the Proposed Development or using published estimates from other solar schemes;

- The potential for existing employment within the Site boundary, for example in agriculture to and/or associated with the visitor economy be lost or relocated as a result of the Proposed Development would also be assessed, during construction, operation and decommissioning. This would also take into account the potential for income diversification to landowners via income received in rent from the Proposed Development. Indirect employment effects arising from the expenditure of new employees and the investment required for the Proposed Development at construction, operation and decommissioning would also be assessed using economic multipliers. The “net additional” number of jobs (i.e. gains less any losses) would be presented; and
- The supply of labour – both in terms of the number of employees and the relevant skills required - likely to be provided by the local labour market and the two districts, considering commuting/travel to work patterns.

16.6.7. Potential socio-economic effects that would be further considered in terms of **Tourism and the visitor economy** are:

- Potential for and impacts of temporary use of local accommodation by construction workers, on the owners and other visitors to the Local Area during construction and decommissioning phases; and
- Wider impacts of changes to local amenity and facilities such as PRow/ open space on the likelihood of visitors to the Local Area and any associated employment effects to local business owners and employees during construction, operation and decommissioning phases.

16.6.8. The effects to be scoped into the detailed assessment are summarised in Table 16.2 below. The list of social determinants (potential effects) is drawn from that set out in the ISEP 2025 guidance⁴²⁶.

Table 16.2 Effects Scoped in to Detailed Assessment

Potential Effect	Rationale to be Scoped In
Socio-economic conditions as a social determinant	
Social change due to impact on jobs and GVA created, safeguarded or lost.	<i>Construction and decommissioning:</i> The Proposed Development is expected to support an increase in temporary employment opportunities at the Site boundary, at a range of skills levels and with at least a proportion accessible to people in the Local Area.

Operation and maintenance: Permanent roles are expected to be supported once the Proposed Development becomes operational, with at least a proportion accessible to people in the Local Area.

All phases: Consideration would be given to the risk of employment losses in agriculture. Any increase in employment noted above, would be compared with any potential for employment losses (referred to as displacement effects) for example in local employment in agriculture within the Site boundary. It is important to note that any such effects are unknown at this stage and would be further examined. The overall net effect on employment would be examined during construction, operation and decommissioning.

All phases: Consideration would be given to labour supply. The assessment would examine sources of labour supply, both in terms of the number of jobs, the nature of the roles and skill level required as well as that available in the local labour market. This would help to establish the likelihood of jobs being filled locally or from further afield.

Social change due to impact on structural economic factors, including traditional industries or foundational economy (including impact on tourism-based livelihoods).

All phases: The potential for the visitor economy/tourism to be affected would be examined. First, provision of accommodation/visitor attractions near to the Site boundary and associated employment would be assessed. Second, any specific works proposed and distances would be examined, taking into account any natural/proposed barriers. Third, assessments of amenity (e.g. Noise, Air Quality, Transport and Access, Built Heritage, and Landscape and Visual impact) would be cross-referred. Mitigation measures proposed (and associated management plans) would be taken into account. Fourth, the size of the Site boundary, and the nature and duration of very localised proposed works across the Site boundary over the construction duration would be evaluated. Fifth, we would consider the extent to which additional construction employment on Site boundary may offset potential adverse effects on demand. Sixth, when considering the potential for effects during operation, we would review published evidence on the relationship between presence of solar farms and Tourism.

Housing as a social determinant

Social change due to impact on homes or accommodation quality, supply, price or access.

Construction and decommissioning: The net change in employment and the extent to which these jobs are likely to be filled by local people would influence the likely demand on accommodation in the Local Area. Consideration would include the potential for and impacts of temporary use of local accommodation by construction and decommissioning workers, on the owners and other visitors to the Local Area during construction and decommissioning phases. This links with tourism economy effects discussed above.

Living environment as a social determinant

Social change due to impact on public access to outdoor spaces and routes, including sports, play and recreation.

All phases: Wider impacts of changes to local amenity and facilities such as public rights of way / open space on the likelihood of visitors to the Local Area and any associated employment effects to local business owners and employees. This links with tourism economy effects discussed above.

16.7. Proposed Approach to the ES

Assessment Methodology

Further Baseline Data

- 16.7.1. A further review of relevant national, regional and local policies would be carried out to identify the key issues relevant to the Proposed Development.
- 16.7.2. More detailed review of baseline socio-economic conditions would be undertaken, alongside assessment of current uses, facilities and social infrastructure around the Site boundary. Data may be used at SOA, LSOA, District and regional level. Where the 'Zone of Influence' of the Proposed Development differs from the spatial levels noted above, other metrics such as proximity, travel/commuting distances and/ or defined planning areas may be more appropriate and would be considered.
- 16.7.3. As noted above, published socio-economic data for very small areas are prone to greater margin for error than larger areas. Surveys would continue with landowners to ascertain:
 - Full time, part time and seasonal employment on landowner and tenant plots, and approximate hours worked; and
 - Landowner expectations for continued employment of the above roles either on the same plots, if feasible, or others owned by the landowner, if relevant.

Methodology for Assessment of Effects at Construction, Operation and Decommissioning

- 16.7.4. Based on the ISEP (2025) guidance⁴²⁶, the following approach is proposed.
- 16.7.5. Social impact assessment is analysing, monitoring and managing the social consequences of development⁴⁵³. In the context of EIA, Social Impact Assessment is a means of investigating and understanding the likely significant effects of new development on the host community⁴²⁶. Social impact assessment aims to bring about a more ecologically, socio-culturally and economically sustainable and equitable environment⁴⁵⁴.
- 16.7.6. The social assessment looks at social outcomes at the community level. The social assessment considers the societal pressures placed on, and opportunities provided to, the relevant community(s) due to the Proposed Development. Whilst this includes the experiences of, and outcomes to, the people that make up that community, as well as effects on infrastructures (e.g. schools) and services; the primary receptor for the assessment is the community or communities of the relevant study area / zone of influence.
- 16.7.7. For each social determinant, the approach assesses the sensitivity of the relevant community(s), and the magnitude of the impacts due to the Proposed Development.

Sensitivity

- 16.7.8. The criteria for community sensitivity are outlined in Table 16.3. Judgements are based on most relevant criteria as it is likely in any given analysis that some criteria would span categories.
- 16.7.9. For Social Impact Assessment receptors are the defined communities. Within these communities there would be workforces, residents, visitors, businesses, services, events, neighbourhoods, facilities, assets, sites, routes, habitats and spaces. The community would also be set within a wider context of markets, identity and other societal influences.
- 16.7.10. In assessing the sensitivity of a community, relevant characteristics of the community are considered in terms of their value, capacity, scarcity and/or dependency. Characteristics affected may include for example, labour markets, traditional industries, accommodation markets, key public services, key community facilities or amenities, certain population groups, cultural sites, the community setting, protected languages, natural capital or public spaces.

⁴⁵³ IAIA (2003) International Principles for Social Impact Assessment. <https://iaia.org/wp-content/uploads/2025/02/BEST-PRACTICE-SIA-Principles.pdf>

⁴⁵⁴ IAIA (no date) Social Impact Assessment (online) <https://iaia.org/social-impact-assessment/social-impact-assessment-general-info/>

Table 16.3 Community Sensitivity Criteria

Level	Indicative criteria
High	The value of a key community characteristic (e.g. market, traditional industry or minority language) is high because it is highlighted as important or is protected in relevant strategies, policies or official publications. The capacity of a key community characteristic (e.g. tourism, labour or housing market) to absorb change is limited because: it has little or no headroom relative to existing demand (e.g. for visitor bedspaces); is based on inherent fragility or constraints (e.g. tourism reliant on the tranquillity of the environment); or is reliant on a population with high degrees of baseline deprivation. The scarcity of a key community characteristic (e.g. footpath, traditional industry, asset, land allocation or service) is high, because: there are no alternatives; or it is considered to be of regional or national importance. The dependence on a key community characteristic is essential because it is a critical public service (e.g. a sole health or education provider); or it sustains usual daily activities (e.g. sole community leisure facility or play park); or local livelihoods rely upon it (e.g. crofting land).
Medium	The value of a key community characteristic is medium because it is referenced directly but only as contributory in relevant strategies, policies or official publications. The capacity of a key community characteristic to absorb change is moderate because: it has some headroom relative to existing demand; has some reliance on inherent fragility or constraints; or is reliant on a population with moderate degrees of baseline deprivation. The scarcity of a key community characteristic is medium, because: there are limited alternatives; or it is considered to be of local or regional importance. The dependence on a key community characteristic is influential because it is a core public service; or it supports usual daily activities; or local livelihoods make high use of it.
Low	The value of a key community characteristic is low because it is only referenced indirectly or as peripheral within relevant strategies, policies or official publications. The capacity of a key community characteristic to absorb change is high because: it has adequate headroom relative to existing demand (e.g. for visitor bedspaces); has limited reliance on inherent fragility or constraints; or is reliant on a population with low degrees of baseline deprivation. The scarcity of a key community characteristic is low, because: there are adequate alternatives; or it is considered to be of limited local or regional importance. The dependence on a key community characteristic is marginal because it is a standard service; or it has limited influence on usual daily activities; or local livelihoods make little use of it.
Negligible	The value of a key community characteristic is limited because it is not referenced in relevant strategies, policies or official publications.

The capacity of a key community characteristic to absorb change is very high because: it has plenty of headroom relative to existing demand; has no reliance on inherent fragility or constraints; or is reliant on a population with very low degrees of baseline deprivation.

The scarcity of a key community characteristic is very low, because: there are a more than adequate alternatives; or it is not considered to be of local or regional importance.

The dependence on a key community characteristic is low because it is a common service; or it has no influence on usual daily activities (e.g. inaccessible private land); or local livelihoods make no use of it (e.g. derelict buildings).

Magnitude

- 16.7.11. The criteria for impact magnitude are outlined in Table 16.4. Judgements are based on most relevant criteria as it is likely in any given analysis that some criteria would span categories.
- 16.7.12. In assessing the magnitude of an impact, relevant characteristics of the Proposed Development change are considered in terms of their size, scale, duration, frequency and reversibility. Community characteristics impacted may include for example, jobs, bedspaces, demographics, land use or services.

Table 16.4 Magnitude Criteria

Level	Indicative criteria
High	High size or scale; long-term duration; continuous frequency; permanent change.
Medium	Medium size or scale; medium-term duration; frequent events; gradual reversal.
Low	Small size or scale; short-term duration; occasional events; rapid reversal.
Negligible	Negligible size or scale; very short-term duration; one-off frequency; immediate reversal.

- 16.7.13. The following size definitions guide the social impact assessment:
- Large size relates to impacts characterised as follows. The number of jobs expected to be created is a large proportion of the existing local labour supply; or the number of new residents is a large proportion of the baseline population. The project would create employment in sectors which would cause structural economic change in a place.
 - Medium size relates to impacts characterised as follows. The number of jobs expected to be created is a moderate proportion of the existing local labour supply; or the number of new residents is a moderate proportion of the baseline population. The project would create employment in sectors which would cause influential economic change in a place.

- Small size relates to impacts characterised as follows. The number of jobs expected to be created is a small proportion of the existing local labour supply; or the number of new residents is a small proportion of the baseline population. The project would create employment in sectors which would cause marginal economic change in a place.
- Negligible size relates to impacts characterised as follows. The number of jobs expected to be created is a very small proportion of the existing local labour supply; or the number of new residents is a very small proportion of the baseline population. The project would create employment in sectors which would cause no discernible economic change in a place.

16.7.14. The following scale of change definitions guide the social impact assessment:

- High scale relates to profound change in conditions or availability of a resource that influences social outcomes. Change is dominant. Impact is experienced across large geographic areas or to a large number of communities/receptors. Typically, impacts are widespread and experienced in full across the area; or critically impacts a key service covering that area for which there is no alternative. Typically, the addition or removal of the majority, or entirety, of an influential resource.
- Medium scale relates to notable change in conditions or availability of a resource that influences social outcomes. Change is prominent. Impact is experienced across moderate geographic areas or to a moderate number of communities/receptors. Typically, impacts are widespread but experienced variably across the area; or markedly impacts a key service covering that area for which there are limited alternatives. Typically, the addition or removal of a sizable component of an influential resource.
- Small scale relates to marginal change in conditions or availability of a resource that influences social outcomes. Change is noticeable but generally unobtrusive unless scrutinised. Impact is experienced across small geographic areas or to a small number of communities/receptors. Typically, impacts are localised and experienced variably across the area; or marginally impacts a key service covering that area for which there are no or limited alternatives. Typically, the modification of a small part of an influential resource, or larger change to a resource that has limited influence in the context.
- Negligible scale relates to no discernible change in conditions or availability of a resource that influences social outcomes. Change is generally indiscernible. Impact is experienced across very small geographic areas or to very few communities/receptors. Typically, impacts are highly localised; or relate to very specific users of an impacted service covering that area for which there are no alternatives. Typically, the modification of a small part of a resource that has limited influence in the context.

16.7.15. The following duration of impact definitions guide the social impact assessment:

- Long-term relates to impacts predominantly experienced over many years or decades. Typically, operational effects.

- Medium-term relates to impacts predominantly experienced over months or a few years. Typically, overall construction, maintenance or decommissioning effects at a given location.
- Short-term relates to impacts predominantly experienced over months. Typically, localised construction, maintenance or decommissioning effects at a given location.
- Very-short-term relates to impacts predominantly experienced over hours, days or weeks. Typically, highly localised construction, maintenance or decommissioning effects at a given location.

16.7.16. The following frequency of impact definitions guide the social impact assessment:

- Continuous relates to impacts characterised as experienced on an ongoing basis without interruption. Typically, where there is a dominant influence from operational infrastructure or activities at permanently occupied locations with no respite and no meaningful variation; or atypical construction, maintenance or decommissioning activities undertaken on a 24hr basis for a specified period.
- Frequent relates to impacts characterised as experienced on a regular basis but where planned schedules provide respite, or normal behaviours in the receiving population provide meaningful variation. Typically, construction, operation and maintenance or decommissioning activities undertaken during normal work hours; or experiences of infrastructure or activities that are common but interspersed by other influences and time at other locations.
- Occasional relates to impacts characterised as seldom experienced or only experienced on a transitory basis. Typically, planned construction, operation and maintenance or decommissioning irregular events; or fleeting experiences of infrastructure or activities from time-to-time, for example whilst passing along a transport route.
- One-off relates to impacts characterised as experienced rarely or only once. Typically, a temporary but noteworthy event during construction or decommissioning; or relating to a mitigated but still foreseeable atypical events occurring, such as an accident or unplanned repair.

Significance

- 16.7.17. Determination of the likely significance of social or economic effects, including distributional effects, is an evidence and context based professional judgment. To guide the professional judgment a matrix is used (see Table 16.5).
- 16.7.18. Where the matrix offers more than one significance option, professional judgement is used to decide which option is most appropriate.
- 16.7.19. Effects of moderate and above are considered significant in terms of the EIA Regulations.

Table 16.5 Indicative Assessment Matrix

Magnitude of Impact	Sensitivity of Community			
	High	Medium	Low	Negligible
High	Major	Moderate or major	Moderate or minor	Minor or negligible
Medium	Moderate or major	Moderate	Minor	Minor or negligible
Low	Moderate or minor	Minor	Minor	Negligible
Negligible	Minor or negligible	Minor or negligible	Negligible	Negligible

16.7.20. The narrative accompanying the significance conclusion is informed by the criteria set out in Table 16.6. Judgements are based on most relevant criteria as it is likely in any given analysis that some criteria would span categories.

Table 16.6 Significance Criteria

Level	Indicative criteria
Major (significant)	The narrative explains that this is significant community effect because: - Changes, due to the Proposed Development, have a substantial effect on the ability to deliver current social or economic policy (including in relation to distributional inequalities). - There is likely to be a major change in the social or economic baseline of the community(s) of the relevant study area.
Moderate (significant)	The narrative explains that this is significant community effect because: - Changes, due to the Proposed Development, have an influential effect on the ability to deliver social or economic policy (including in relation to distributional inequalities). - There is likely to be a moderate change in the social or economic baseline of the community(s) of the relevant study area.
Minor (not significant)	The narrative explains that this is not significant community effect because: - Changes, due to the Proposed Development, have a marginal effect on the ability to deliver social or economic policy (including in relation to distributional inequalities). - There is likely to be a minor change in the social or economic baseline of the community(s) of the relevant study area.
Negligible (not significant)	The narrative explains that this is not significant community effect because:

- Changes, due to the Proposed Development, are not related to the ability to deliver current social or economic policy (including in relation to distributional inequalities).
- There is likely to be a negligible change in the social or economic baseline of the community(s) of the relevant study area.

16.7.21. The approach to cumulative schemes is detailed in **Chapter 5: Approach to EIA**.

16.7.22. The assessment would aim to quantify effects where possible, although where this is not possible some effects would be assessed qualitatively. Effects are defined as follows:

- Beneficial classifications of effect indicate an advantageous or positive effect on the defined receptors within the Study Area(s);
- Neutral classifications of effect indicate no perceived effects on the defined receptors within the Study Area(s); and
- Adverse classifications of effect indicate a disadvantageous or negative effect on the defined receptors within the Study Area(s).

16.7.23. The community receptors in the study area for each potential effect would be defined according to the appropriate spatial scale, which may differ for each potential effect. It may be relevant to assess the significance of certain effects at multiple spatial scales (e.g. both locally and regionally).

17. Air Quality (Scoped Out)

17.1. Introduction

- 17.1.1. This Chapter of the Scoping Report presents the scope of the detailed assessment for air quality impacts upon human and ecological receptors for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It concludes by setting out justification as to why effects are proposed to be scoped out and outlines the method that would be used to undertake the standalone assessment.

17.2. Review of Policy, Legislation, and Relevant Guidance

- 17.2.1. Legislation, planning policy and guidance relating to air quality, and relevant to the Proposed Development comprises:

Legislation

- The Environmental Protection Act 1990⁴⁵⁵;
- Part IV of the Environment Act 1995⁴⁵⁶;
- The Clean Air Act 1993⁴⁵⁷;
- The Air Quality (England) Regulations 2000⁴⁵⁸;
- The Air Quality (England) (Amendment) Regulations 2002⁴⁵⁹;
- The Air Quality Standards Regulations 2010⁴⁶⁰;
- The Environment Act 2021⁴⁶¹; and
- The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023⁴⁶².

⁴⁵⁵ Environmental Protection Act 1990 (1990), Available:

<http://www.legislation.gov.uk/ukpga/1990/43/contents>

⁴⁵⁶ Environment Act (1995), HMSO, Available: <http://www.legislation.gov.uk/ukpga/1995/25/contents>

⁴⁵⁷ Clean Air Act 1993 (1993), HMSO, Available: <http://www.legislation.gov.uk/ukpga/1993/11/contents>

⁴⁵⁸ The Air Quality (England) Regulations 2000 Statutory Instrument 928 (2000), HMSO, Available: <http://www.legislation.gov.uk/uksi/2000/928/contents/made>

⁴⁵⁹ The Air Quality (England) (Amendment) Regulations 2002, Statutory Instrument 3043 (2002), HMSO, Available: <https://www.legislation.gov.uk/uksi/2002/3043/contents/made>

⁴⁶⁰ The Air Quality Standards Regulations 2010 Statutory Instrument 1001 (2010), HMSO, Available: http://www.legislation.gov.uk/uksi/2010/1001/pdfs/uksi_20101001_en.pdf

⁴⁶¹ Environment Act 2021 (2021).

⁴⁶² The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, Statutory Instrument 96 (2023), available: <https://www.legislation.gov.uk/uksi/2023/96/contents/made>

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)⁴⁶³;
- Draft Overarching National Policy Statement for Energy (EN-1) (2025)⁴⁶⁴;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)⁴⁶⁵;
- Draft National Policy Statement for Renewable Infrastructure (EN-3)⁴⁶⁶;
- National Planning Policy Framework (NPPF) (updated February 2025)⁴⁶⁷;
- Environmental Improvement Plan (2023)⁴⁶⁸;
- Clean Air Strategy (2019)⁴⁶⁹;
- Air Quality Strategy (2007)⁴⁷⁰;
- Air Quality Strategy (2023)⁴⁷¹;
- Reducing Emissions from Road Transport: Road to Zero Strategy (2018)⁴⁷²;
- National Air Quality Plan (2017) and Supplement (2018)⁴⁷³; and

⁴⁶³ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

⁴⁶⁴ Department for Energy Security and Net Zero (2025), Draft Overarching National Policy Statement for Energy (EN-1), Available at: <https://assets.publishing.service.gov.uk/media/68093d68148a9969d2394f59/draft-nps-en-1.pdf>

⁴⁶⁵ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

⁴⁶⁶ Department for Energy Security and Net Zero (2025), Draft National Policy Statement for Renewable Energy Infrastructure (EN-3), Available at: <https://assets.publishing.service.gov.uk/media/6809f0588c1316be7978e7cb/draft-nps-en-3.pdf>

⁴⁶⁷ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁴⁶⁸ Defra (2023) Environmental Improvement Plan 2023, [Online], Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1133967/environmental-improvement-plan-2023.pdf.

⁴⁶⁹ Defra (2019) Clean Air Strategy 2019, Available: <https://www.gov.uk/government/publications/clean-air-strategy-2019>.

⁴⁷⁰ Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Defra.

⁴⁷¹ Defra (2023) Air Quality Strategy: Framework for Local Authority Delivery, [Online], Available: <https://www.gov.uk/government/publications/the-air-quality-strategy-for-england/air-quality-strategy-framework-for-local-authority-delivery>

⁴⁷² DfT (2018) The Road to Zero: Next steps towards cleaner road transport and delivering our Industrial Strategy.

⁴⁷³ Defra (2018) Supplement to the UK plan for tackling roadside nitrogen dioxide concentrations, Available: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/746100/air-quality-no2-plan-supplement.pdf.

- PM_{2.5} Targets: Interim Planning Guidance (2024)⁴⁷⁴.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)⁴⁷⁵, specifically Policy CC6 'Solar Farms';
- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)⁴⁷⁶;
- Rother District Council Local Plan Core Strategy (Adopted September 2014)⁴⁷⁷;
- Rother District Council Draft Local Plan (2024)⁴⁷⁸; and
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)⁴⁷⁹.

National Guidance

- Planning Practice Guidance (2023)⁴⁸⁰, Air Quality (2019)⁴⁸¹;
- Environmental Protection UK (EPUK) & Institute of Air Quality Management (IAQM) Guidance: Land-Use Planning & Development Control: Planning for Air Quality (2017)⁴⁸²;
- IAQM Guidance on the Assessment of Dust from Demolition and Construction (2024)⁴⁸³; and
- Defra Local Air Quality Management Technical Guidance LAQM.TG(22) (2025)⁴⁸⁴.

⁴⁷⁴ Defra (2024) PM_{2.5} Targets: Interim Planning Guidance, [Online], Available: <https://uk-air.defra.gov.uk/pm25targets/planning>.

⁴⁷⁵ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

⁴⁷⁶ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

⁴⁷⁷ Rother District Council (2014) Local Plan Core Strategy. Available at: <https://rdcpublish.blob.core.windows.net/website-uploads/2022/09/Core-Strategy-2014.pdf>

⁴⁷⁸ Rother District Council (2024) Rother Local Plan 2020 – 2040: Draft (Regulation 18) Version. Available: https://rdcpublish.blob.core.windows.net/website-uploads/2024/04/New-Local-Plan_Reg-18_version_Final.pdf

⁴⁷⁹ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

⁴⁸⁰ DLUHC (2023) 'Planning Newsletter'.

⁴⁸¹ Ministry of Housing, Communities & Local Government (2019) Planning Practice Guidance, Available: <https://www.gov.uk/government/collections/planning-practice-guidance>.

⁴⁸² Moorcroft and Barrowcliffe et al (2017) Land-Use Planning & Development Control: Planning for Air Quality v1.2, IAQM, London, Available: <http://iaqm.co.uk/guidance/>.

⁴⁸³ IAQM (2024) Guidance on the Assessment of Dust from Demolition and Construction v2.2, [Online], Available: <http://iaqm.co.uk/guidance/>.

⁴⁸⁴ Defra (2025) Review & Assessment: Technical Guidance LAQM.TG22 May 2025 Version, [Online], Available: <https://iaqm.defra.gov.uk/wp-content/uploads/2025/05/LAQM-TG22-May-25-v2.0.pdf>.

Local Guidance

- Air quality and emissions mitigation guidance for Sussex (2021)⁴⁸⁵

17.3. Existing Baseline Conditions

- 17.3.1. This section of the Scoping Chapter for air quality sets out the known current baseline conditions at this (scoping) stage of the project. It is noted that no further baseline surveys or assessments are proposed to inform the technical assessment for the Environmental Statement. A comment on future baseline conditions is also included.

17.4. Study Area

- 17.4.1. The assessment of dust and particulate emissions from construction activities considers the potential effects within a 250m radius of the Site boundary, or within 50m of roads used by construction vehicles within 250m of the Site boundary exit (the point at which the vehicles re-enter the public highway). This is in line with Institute of Air Quality Management (IAQM)⁴⁸³ guidance.
- 17.4.2. The assessment of pollutant emissions from road traffic exhausts defines the study area based on criteria in the Design Manual for Roads and Bridges (DMRB), which considers there is a potential for air quality road traffic impacts “on sensitive receptors within 200m of a road.” A distance of 200m is used as concentrations from road sources decrease rapidly with distance from the source and beyond this distance the road source contribution is not typically discernible. The key pollutants in terms of human health impacts from road traffic emissions are nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}). For ecological impacts, the key pollutants are oxides of nitrogen (NO_x) and ammonia (NH₃).

Approach to the Collection of Baseline Data for Scoping

- 17.4.3. For the purpose of this scoping chapter, air quality baseline conditions have been established using a number of approaches:
- Local sources have been identified through examination of the Councils’ Air Quality Review and Assessment reports^{486 487};
 - Information on existing air quality has been obtained by collating the results of monitoring carried out by the local authorities^{486 487};
 - Background concentrations have been defined using the Department for Environment, Food and Rural Affairs’ (Defra) 2021-based background

⁴⁸⁵ Sussex Air Quality Partnership (2021) Air quality and emissions guidance for Sussex, [Online], Available: <https://sussex-air.net/wp-content/uploads/2022/09/Sussex-AQ-Guidance-V.1.2-2021.pdf>

⁴⁸⁶ Folkestone and Hythe District Council (2024) Air Quality Annual Status Report.

⁴⁸⁷ Rother District Council (2024) Air Quality Annual Status Report.

maps⁴⁸⁸. These cover the whole of the UK on a 1x1 km grid and are intended to be representative of air quality conditions away from major roads or other significant sources of emissions; and

- Whether or not there are any exceedances of the annual mean limit value for NO₂, PM₁₀ and PM_{2.5} in the study area has been identified using Defra's Compliance data⁴⁸⁹.

Relevant Baseline Conditions for Scoping

- 17.4.4. The Proposed Development falls mostly within the administrative boundary of Folkstone and Hythe District Council (FHDC), and partially within that of Rother District Council (RDC). Neither council has declared an Air Quality Management Area (AQMA).
- 17.4.5. The Site boundary is rural and no significant industrial sources have been identified that are likely to affect the Proposed Development or baseline conditions, in terms of air quality. Lydd Airport is located in the study area, however it does not experience sufficient air traffic movements to be of concern in terms of air quality.
- 17.4.6. FHDC monitors air quality throughout its administrative area using a network of NO₂ diffusion tubes, including at three locations within 2 km of the Site boundary. The locations are shown in **Figure 17.1 within Appendix E** and annual mean NO₂ results for 2019 to 2023 are shown in Table 17.1. Results have been taken from FHDC's 2024 Air Quality Annual Status Report⁴⁸⁶, which is the latest year of air quality monitoring data within the public domain.

Table 17.1 Summary of Annual Mean NO₂ Monitoring (2019-2023) (µg/m³)

Site boundary ID	Site boundary Type	Location	2019	2020	2021	2022	2023
DT10	Roadside	Martins Cottages	16.6	13.1	14.0	14.4	11.8
DT17	Roadside	St Andrews Road	-	9.9	9.6	9.8	8.9
DT18	Roadside	Littlestone Road	-	14.0	15.3	12.6	14.1
Objective			40				

- 17.4.7. As shown in Table 17.1, there have been no recorded exceedances of the annual mean NO₂ objective (of 40 µg/m³) at the nearby monitoring sites since at least 2019, with measured concentrations well below the air quality objective for the protection of human health. Concentrations have therefore also remained

⁴⁸⁸ Defra (2025) Local Air Quality Management (LAQM) Support Website, [Online], Available: <http://laqm.defra.gov.uk/>.

⁴⁸⁹ Defra (2025) UK Ambient Air Quality Interactive Map, [Online], Available: <https://uk-air.defra.gov.uk/data/gis-mapping>.

well below $60 \mu\text{g}/\text{m}^3$, indicating that exceedances of the 1-hour mean NO_2 objective are unlikely to have occurred (according to methodology set out in Defra's LAQM.TG(22))⁴⁸⁴. There has been a decrease in concentrations observed since 2019, which is in line with trends observed nationally⁴⁹⁰.

- 17.4.8. While 2020 and 2021 results have been presented for completeness, they would not be relied upon in any way as they are unlikely to be representative of 'typical' air quality conditions due to the impact of the COVID-19 pandemic restrictions on traffic volumes and thus pollutant concentrations.
- 17.4.9. No monitoring of PM_{10} or $\text{PM}_{2.5}$ concentrations is carried out by FHDC, but based on the rural location of the Site boundary away from any major sources of emissions, the baseline pollutant concentrations are expected to be close to background levels (presented below).
- 17.4.10. There are no Automatic Urban and Rural Network (AURN) monitoring sites operated by Defra in the study area with which to identify exceedances of the annual mean NO_2 limit value. Defra's roadside annual mean NO_2 concentrations, which are used to identify and report exceedances of the limit value, did not identify any exceedances within the study area in 2023. As such, there is considered to be no risk of a limit value exceedance in the vicinity of the Proposed Development by the time that it is operational.
- 17.4.11. Estimated background concentrations in the study area, derived from Defra's 2021-based background maps, are set out in Table 17.2 and are all well below the objectives for all pollutants. A range of values is presented as the study area covers multiple 1x1 km grid squares.

Table 17.2 Estimated Annual Mean Background Concentrations in 2023 ($\mu\text{g}/\text{m}^3$)

Year	NO_2	PM_{10}	$\text{PM}_{2.5}$
2023	6.3 – 7.0	8.2 – 11.1	5.1 – 5.6
Objective	40	40	20^a / 10^b

^a The $20 \mu\text{g}/\text{m}^3$ $\text{PM}_{2.5}$ objective, which was to be met by 2020, is not in Regulations and there is no requirement for local authorities to meet it.

^b To be met by 2040.

- 17.4.12. Future air quality conditions (i.e. anticipated opening year of the Proposed Development) at the Site boundary are expected to be better than current conditions, as policies and measures to improve air quality (such as the change in vehicle fleets to electric cars) and reduced emissions, continue to deliver

⁴⁹⁰ Air Pollution in the UK 2023, Defra, September 2024. Available at https://uk-air.defra.gov.uk/library/annualreport/viewonline?year=2023_issue_1#report_pdf

improvements. As such, future baseline conditions are assumed to be better than and not materially different to the 2023 conditions.

Important Receptors Identified

Construction Dust

- 17.4.13. The IAQM construction dust risk assessment approach⁴⁸³ does not require specific sensitive receptors to be identified; instead, the numbers of different types of receptors within given distance bands are counted. It considers the potential for impacts within 250m of the Site boundary, or within 50m of roads used by construction vehicles within 250m of the Site boundary exit.
- 17.4.14. The guidance explains that residential properties, schools and care homes are 'high' sensitivity receptors to dust soiling, while public parks and places of work are 'medium' sensitivity receptors with farmland being 'low' sensitivity. Residential properties, schools and care homes are classified as being of 'high' sensitivity for human health effects, while places of work and shops are classified as being of 'medium' sensitivity and public parks are of 'low' sensitivity. Internationally designated sites, such as Special Areas of Conservation (SAC), are of 'high' sensitivity to ecological effects, while nationally designated sites, such as Sites of Special Scientific Interest (SSSI), are 'medium' sensitivity receptors and local sites, such as Local Nature Reserves (LNR), are of 'low' sensitivity. The exact ecological sites to be included in the assessment, and their sensitivities, would be determined in collaboration with the project ecologist (see **Chapter 6: Biodiversity**).

Construction Plant

- 17.4.15. Sensitive receptors are determined according to the same criteria discussed in paragraph 17.4.16.

Road Traffic

- 17.4.16. All the human health objectives apply at locations where members of the public are likely to be regularly present on a long-term basis such as at residential properties. Only the 1-hour NO₂ objective applies at retail, education, and community properties and public realm spaces, as it is unlikely people would spend an extended period of time (i.e. 24 hours) in these locations. Offices and places of work are not covered by the national air quality objectives.
- 17.4.17. Internationally and nationally designated ecological sites – Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar and Sites of Special Scientific Interest (SSSI) – located within 200m of a road likely to be affected by the construction and operation of the Proposed Development, within 10km of the Site boundary, are considered.

17.5. Environmental Measures

- 17.5.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to air quality would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures would be implemented and included within the Proposed Development.

Construction

- 17.5.2. With good practice dust management measures in place, guidance from the IAQM⁴⁸³ states there would be no significant effects from the generation of dust. Dust management measures would be included within the outline Construction Environmental Management Plan (oCEMP) included as part of the DCO Application.
- 17.5.3. Similarly, the operation of construction plant and vehicles would also be managed through relevant management plans, to be secured as part of the DCO Application.

Operation

- 17.5.4. The Proposed Development would not result in any significant air quality effects during operation, as set out below, and as such no embedded measures have been identified. It is noted that a change of use from agricultural use to the Proposed Development has the potential to improve local air quality through the reduction in emissions generated by agriculture (such as emissions from agricultural plant, the use of any chemicals and pesticides, and the generation of fine particulates from activities such as harvesting and ploughing).

Decommissioning

- 17.5.5. As for the construction phase, during decommissioning, management measures to ensure there are no significant effects on air quality would be included within the outline Decommissioning Environmental Management Plan (oDEMP) included as part of the DCO Application. This commitment is detailed within the Scoping Commitments Register.

17.6. Scope of the Assessment

Consultation Undertaken to Date

- 17.6.1. To date, no consultation has been undertaken specific to Air Quality. Further information on consultation completed to date for the Proposed Development is detailed in Section 5.5 of **Chapter 5: Approach to EIA**.

Assessment Methodology

Construction

Construction Dust

- 17.6.2. Guidance published by the Institute of Air Quality Management (IAQM)⁴⁸³ is clear that with good practice dust management measures in place, commensurate to the risk identified by the risk assessment to be undertaken following the methodology set out in the guidance, effects would be 'not significant'.
- 17.6.3. A risk assessment would be undertaken and appropriate measures secured in the oCEMP to be submitted as part of the DCO application. It can therefore be concluded that with the recommended dust management and mitigation measures in place, no significant effects would occur. Regarding potential cumulative effects, the IAQM guidance⁴⁸³ also suggests that cumulative construction dust impacts would only be likely where construction sites are within 250 m of each other. Construction activities would also have to be occurring in areas of both sites that are close to the same receptor for potential cumulative effects to occur. It is anticipated that all construction sites would adopt appropriate mitigation measures to limit emissions of dust, would hold the liaison meetings and would ensure that plans are co-ordinated to minimise impacts upon the most sensitive receptors. With these measures in place, the cumulative effect of construction activities should be 'not significant'.
- 17.6.4. Details on Scoping out construction dust are set out in **Appendix B**.

On-site Activities

- 17.6.5. The IAQM guidance⁴⁸³ states:
- "Experience of assessing the exhaust emissions from on-site plant (NRMM) and site traffic suggests that they are unlikely to make a significant impact on local air quality, and in the vast majority of cases they would not need to be quantitatively assessed. For site plant and on-site traffic, consideration should be given to the number of plant/vehicles and their operating hours and locations to assess whether a significant effect is likely to occur".*
- 17.6.6. The Site boundary is large and most of the Site boundary is more than 50 m from any sensitive receptors. Therefore, the areas in which NRMM and Site boundary traffic would typically operate are likely to be located more than 50 m away from any sensitive properties. Additionally, suitable measures for Site boundary plant would be implemented based on advice presented in the IAQM guidance⁴⁸³. Construction plant and vehicles would also be managed through

the CEMP and the Outline Construction Traffic Management Plan (oCTMP) which would be submitted as part of the DCO Application. It is therefore judged that there is no risk of significant effects at existing receptors as a result of on-site machinery emissions.

- 17.6.7. Details on Scoping out construction plant emissions are set out in **Appendix B**.

Road Traffic

- 17.6.8. EPUK and the IAQM⁴⁸² recommend a two-stage screening approach to determine whether emissions from road traffic generated by a development have the potential for significant air quality effects on human health. The approach first considers the size and parking provisions of a development. If the development is residential and is for fewer than ten homes or covers less than 0.5 ha, or is non-residential and would provide less than 1,000 m² of floor space or cover a site area of less than 1 ha, and would provide ten or fewer parking spaces, then there is no need to progress to a detailed assessment.
- 17.6.9. The second stage then compares the changes in vehicle flows on local roads that would result from a development against specified screening criteria. The screening thresholds inside an AQMA are a change in flows of more than 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day. Outside of an AQMA the thresholds are 100 HDVs or 500 LDVs, respectively. Where these criteria are exceeded, a detailed assessment is likely to be required, although the guidance advises that *“the criteria provided are precautionary and should be treated as indicative”*, and *“it may be appropriate to amend them on the basis of professional judgement”*.
- 17.6.10. During the construction phase, the Proposed Development is not expected to increase road traffic to the extent that emissions would cause a significant air quality effect, especially considering the low baseline pollutant concentrations. The exact traffic generation by the Proposed Development would be confirmed and compared to the above screening criteria in a standalone air quality assessment, to be submitted as part of the DCO Application.
- 17.6.11. There is a large Site of Special Scientific Interest (SSSI) within 200m of the A259, which may be used by construction traffic accessing the Site boundary (Dungeness, Romney Marsh and Rye Bay SSSI, which is also a Ramsar and Special Protection Area). Any potential air quality impacts on this designated site would be assessed as part of the standalone assessment and used to inform the wider assessment of potential ecological effects to be submitted as part of the DCO application. Specifically, Natural England’s approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001) would inform whether a detailed assessment of these impacts is required.
- 17.6.12. Details on Scoping out construction traffic are set out in the Solar Scoping Table.

Operation

- 17.6.13. The operation of the Proposed Development would not result in any direct emissions to air. There would be a small number of operational traffic movements associated with maintaining the solar farm, but the number is likely to fall well below the screening thresholds for a detailed air quality assessment set out in the EPUK / IAQM guidance⁴⁸², especially considering the Site boundary is not located close to an AQMA (as discussed above); thus, the Proposed Development would likely not result in any significant effects during operation.

Decommissioning

- 17.6.14. The potential for air quality impacts during the decommissioning phase of the Proposed Development is considered to be similar to during the construction phase; namely, from on-Site boundary dust and NRMM emissions, as well as from road traffic. Consequently, the potential effects are also expected to be not significant, especially considering the anticipated continued improvement in air quality in the future and the mitigation proposed for the construction phase would be sufficient for mitigating and decommissioning effects.

Cumulative Effects

- 17.6.15. **Chapter 5: Approach to EIA** sets out the general approach to assessing the significance of cumulative effects, which would be followed in the preparation of the air quality assessment.

18. Land and Groundwater (Scoped Out)

18.1. Introduction

- 18.1.1. This chapter of the Scoping Report presents the scope of detailed environmental assessment for land and groundwater for the Proposed Development. Specifically, this section of the Scoping Report presents the policy and legislative context, the approach to collecting baseline data relevant to this scoping chapter and an overview of the relevant baseline conditions within the Site boundary and surrounding area. It then sets out the scope of assessment including, with justification, those effects that are proposed to be scoped in or out for detailed assessment and concludes by outlining the method that would be used to undertake the detailed environmental assessment.

18.2. Review of Policy, Legislation, and Relevant Guidance

- 18.2.1. Key legislation, planning policy and guidance relating to land and groundwater, and relevant to the Proposed Development (expanded upon in **Chapter 4: Planning Policy Context**) comprises:

Legislation

- Part IIA of the Environmental Protection Act 1990⁴⁹¹;
- Environment Act 2021⁴⁹²;
- Water Resources Act 1991⁴⁹³;
- Water Act 2003⁴⁹⁴;
- The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017⁴⁹⁵;
- The Groundwater (Water Framework Directive) (England) Direction 2016⁴⁹⁶;
- The Groundwater (England and Wales) Regulations 2009⁴⁹⁷;
- Control of Pollution Act 1974⁴⁹⁸;

⁴⁹¹ Environmental Protection Act 1990, available at: <https://www.legislation.gov.uk/ukpga/1990/43/part/IIA>

⁴⁹² Environment Act 2021, available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents>

⁴⁹³ Water Resources Act 1991, available at: <https://www.legislation.gov.uk/ukpga/1991/57/contents>

⁴⁹⁴ Water Act 2003, available at: <https://www.legislation.gov.uk/ukpga/2003/37/contents>

⁴⁹⁵ The Water Environment (Water Framework Directive) (England and Wales) Regulations, available at: <https://www.legislation.gov.uk/uksi/2017/407/contents>

⁴⁹⁶ The Groundwater (Water Framework Directive) (England) Direction 2016, available at: <https://www.gov.uk/government/publications/the-groundwater-water-framework-directive-england-direction-2016>

⁴⁹⁷ The Groundwater (England and Wales) Regulations 2009, available at: <https://www.legislation.gov.uk/ukdsi/2009/9780111480816>

⁴⁹⁸ Control of Pollution Act 1974, available at: <https://www.legislation.gov.uk/ukpga/1974/40>

- The Environmental Permitting (England and Wales) Regulations 2016⁴⁹⁹;
- The Anti-Pollution Works Regulations 1999⁵⁰⁰;
- The Control of Pollution (Oil Storage) (England) Regulations 2001⁵⁰¹; and
- The Hazardous Waste (England and Wales) Regulations 2005⁵⁰².

National Planning Policy

- Overarching National Policy Statement for Energy (EN-1) (2023)⁵⁰³;
- National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023)⁵⁰⁴;
- National Policy Statement for Electricity Networks Infrastructure (NPS EN-5) (2023)⁵⁰⁵;
- National Planning Policy Framework (NPPF) (updated February 2025)⁵⁰⁶; and
- Environmental Improvement Plan 2023⁵⁰⁷.

Local Planning Policy

- Folkestone and Hythe District Council Places and Policies Local Plan (Adopted September 2020)⁵⁰⁸, specifically Policy CC6 'Solar Farms';

⁴⁹⁹ The Environmental Permitting (England and Wales) Regulations 2016, available at:

<https://www.legislation.gov.uk/uksi/2016/1154/contents>

⁵⁰⁰ The Anti-Pollution Works Regulations 1999, available at:

<https://www.legislation.gov.uk/uksi/1999/1006/contents/made>

⁵⁰¹ The Control of Pollution (Oil Storage) (England) Regulations 2001, available at:

<https://www.legislation.gov.uk/uksi/2001/2954/contents>

⁵⁰² The Hazardous Waste (England and Wales) Regulations 2005, available at:

<https://www.legislation.gov.uk/uksi/2005/894/contents>

⁵⁰³ Department for Energy Security and Net Zero (2023), Overarching National Policy Statement for Energy (EN-1), available at: <https://www.gov.uk/government/publications/overarching-national-policy-statement-for-energy-en-1>

⁵⁰⁴ Department for Energy Security and Net Zero (2023), National Policy Statement for Renewable Energy Infrastructure (EN-3), available at: <https://www.gov.uk/government/publications/national-policy-statement-for-renewable-energy-infrastructure-en-3#full-publication-update-history>

⁵⁰⁵ Department for Energy Security and Net Zero (2023) (designated in January 2024). National Policy Statement for Electricity Networks Infrastructure (EN-5), available at:

<https://www.gov.uk/government/publications/national-policy-statement-for-electricity-networks-infrastructure-en-5>

⁵⁰⁶ Ministry of Housing, Communities and Local Government (2025), National Planning Policy Framework (NPPF) (Revised February 2025), available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁵⁰⁷ Environmental Improvement Plan 2023, available at:

<https://www.gov.uk/government/publications/environmental-improvement-plan>

⁵⁰⁸ Folkestone and Hythe District Council (2020), Places and Policies Local Plan, available at:

<https://www.folkestone-hythe.gov.uk/downloads/file/3598/places-and-policies-local-plan>

- Folkestone and Hythe District Council Core Strategy Review (Adopted March 2022)⁵⁰⁹;
- Kent Minerals and Waste Local Plan 2024-2039 (Adopted March 2025)⁵¹⁰;
- East Sussex County Council, Council Plan 2025/2026⁵¹¹; and
- East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)⁵¹² with revised policies map (2022).

National Guidance

- Planning Practice Guidance (2023) – Renewable and Low Carbon Energy Guidance⁵¹³;
- Land Contamination Risk Management (Environment Agency, 2025)⁵¹⁴;
- Institute of Environmental Management and Assessment (IEMA) Guide: A New perspective on Land and Soil in Environmental Impact Assessment (2022)⁵¹⁵;
- Design Manual for Roads and Bridges (DMRB) LA 109: Geology and Soils, Revision 0 (2019)⁵¹⁶;
- DMRB LA 113: Road Drainage and the Water Environment, Revision 1 (2020)⁵¹⁷;
- DMRB LA 104: Environmental Assessment and Monitoring, Revision 1 (2020)⁵¹⁸;

⁵⁰⁹ Folkestone and Hythe District Council (2022), Core Strategy Review, available at: <https://www.folkestone-hythe.gov.uk/downloads/file/3593/core-strategy-review-2022>

⁵¹⁰ Kent County Council (2025), Kent Minerals and Waste Local Plan 2024-2039, available at: https://www.kent.gov.uk/_data/assets/pdf_file/0020/215903/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

⁵¹¹ East Sussex County Council, Council Plan 2025/2026, available at <https://www.eastsussex.gov.uk/your-council/about/key-documents/council-plans/2025-26>

⁵¹² East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan 2013, available at: <https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports>

⁵¹³ Planning Practice Guidance (2023), Renewable and Low Carbon Energy, available at: <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

⁵¹⁴ Environment Agency (2023). Land contamination risk management, available at: [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm)

⁵¹⁵ Institute of Environmental Management and Assessment (2022). A New Perspective on Land and Soil in Environmental Impact Assessment, available at: [cd-910-iema-land-and-soils-guidance.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/media/910/iema-land-and-soils-guidance.pdf)

⁵¹⁶ Design Manual for Roads and Bridges LA 109: Geology and Soils, revision 0, October 2019, available at: https://www.standardsforhighways.co.uk/search/adca4c7d-4037-4907-b633-76eae30b9c0_e

⁵¹⁷ Design Manual for Roads and Bridges LA 113: Road Drainage and the Water Environment, revision 1, March 2020, available at: <https://www.standardsforhighways.co.uk/search/d6388f5f-2694-4986-ac46-b17b62c21727>

⁵¹⁸ Design Manual for Roads and Bridges LA 104: Environmental Assessment and Monitoring, revision 1, August 2020, available at: <https://www.standardsforhighways.co.uk/search/0f6e0b6a-d08e-4673-8691-cab564d4a60a>

- A Green Future: Our 25 Year Plan to Improve the Environment⁵¹⁹;
- The Environment Agency's approach to groundwater protection, Version 1.2 (2018)⁵²⁰;
- The Environment Agency, protect groundwater and prevent groundwater pollution (August 2024 update)⁵²¹;
- Construction Industry Research and Information Association (CIRIA) report: Contaminated Land Risk Assessment (A guide to good practice) C552 (2001)⁵²²; and
- CIRIA C532 Control of Water Pollution from Construction sites – Guidance for Consultants and Contractors (2001)⁵²³.

18.3. Existing Baseline Conditions

- 18.3.1. This section of the Scoping Chapter for land and groundwater sets out the known baseline conditions at this (scoping) stage of the Proposed Development.

Study Area

- 18.3.2. The Site boundary plus a 250m buffer has been considered as the study area regarding identifying land and groundwater related receptors that could be impacted by the construction, operation, and decommissioning of the Proposed Development. The extent of the study area is considered appropriate (in line with guidance used for assessing potential site contamination relating to residential developments⁵²⁴, and relevant at the hazard identification stage of an assessment, further informed by professional judgement to ensure that it is appropriate to the subject site) to identify features that may be impacted by the Proposed Development, and which may impact the Proposed Development. Issues that could affect sensitive receptors relating to land and groundwater occur by direct contact (for example contamination such as a fuel spillage

⁵¹⁹ UK Parliament (2023). A Green Future: Our 25 Year Plan to Improve the Environment, available at: https://assets.publishing.service.gov.uk/media/65fd713d65ca2f00117da89e/CD1.H_HM_Government_A_Green_Future_Our_25_Year_Plan_to_Improve_the_Environment.pdf

⁵²⁰ Environment Agency (2018). The Environment Agency's approach to groundwater protection. Version 1.2, available at: [The Environment Agency's approach to groundwater protection \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/the-environment-agencys-approach-to-groundwater-protection)

⁵²¹ Environment Agency (2024). Protect groundwater and prevent groundwater pollution, available at: <https://www.gov.uk/government/publications/protect-groundwater-and-prevent-groundwater-pollution>

⁵²² Construction Industry Research and Information Association (CIRIA) report: Contaminated Land Risk Assessment (A guide to good practice) C552 (2001), available at: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>

⁵²³ CIRIA C532 Control of Water Pollution from Construction Sites – Guidance for Consultants and Contractors (2001), available at: https://www.ciria.org/CIRIA/CIRIA/Item_Detail.aspx?iProductCode=C532

⁵²⁴ Guidance for the Safe Development of Housing on Land Affected by Contamination, National House Building Council, Environment Agency and Chartered Institute of Environmental Health (2008), R&D66, Volume 1, available at:

<https://webarchive.nationalarchives.gov.uk/ukgwa/20140328084622/http://www.environment-agency.gov.uk/static/documents/Leisure/SR-DPUB66-e-e.pdf>

coming into direct contact with soil, or physical contact from construction plant affecting soil quality) or by movement of contamination through soil, subsoil or groundwater. These types of pathways or contacts are physically restricted by factors such as the geology, topography, groundwater regime, and the presence of surface water features. Professional judgement would be used when considering whether sensitive receptors could be affected by different features or issues associated with the Proposed Development.

Approach to the Collection of Baseline Data for Scoping

18.3.3. Baseline data has been collected using the following sources:

- British Geological Survey (BGS) geological maps (bedrock and superficial geology);
- Hydrogeological and groundwater vulnerability maps;
- site-specific information from the environmental database search report, including discharge records relating to groundwater, aquifer designations, source protection zones, designated geological sites, data on the location of waste sites, pollution incidents and potentially contaminated sites;
- Local waste and mineral plans for information relating to mineral extraction sites and mineral safeguarding sites; and
- Historical mapping for the Site boundary acquired as part of the environmental database report.

Relevant Baseline Conditions for Scoping

Designated geological sites

18.3.4. Parts of the Site boundary are within Dungeness, Romney Marsh and Rye Bay Site boundary of Special Scientific Interest (SSSI) that is designated for both ecological and geological reasons. This relates to small areas of land within South Brooks A and South Brooks C, as shown on **Figure 2.6** (see **Appendix E**). Regarding geology, the SSSI is designated due to three elements of importance relating to coastal geomorphology, with designations under the categories 'finite buried interest', 'integrity: active process geomorphological' and 'integrity: static (fossil) geomorphological' (as detailed at Natural England Designated Sites View for Dungeness, Romney Marsh and Rye Bay SSSI⁵²⁵, with categories defined in Natural England General Publication 802 (Part 1)⁵²⁶. The SSSI is also designated as a Geological Conservation Review site (GCR).

⁵²⁵ Natural England Designated Sites Review for Dungeness, Romney Marsh and Rye Bay SSSI, available at: <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S2000533&SiteName=dungeness&countyCode=&responsiblePerson=&SeaArea=&IFCAAra=>

⁵²⁶ NE787 Edition 1 Geoconservation Principles and Practice Part 1, PDF, 10.6 MB, available to download at: <https://publications.naturalengland.org.uk/publication/6152405931261952>

- The majority of South Brooks A is not within the SSSI boundary, the exception being the field closest to Horses Bones Farm.
- South Brooks B is not within the SSSI boundary, and the Ministry of Defence (MoD) land is also excluded from the SSSI.
- A small part of the southern extent of South Brooks C is within the SSSI boundary.
- South Brooks D, E and F are not located within part of the SSSI, although the boundary is adjacent to the Site boundary in numerous locations. The majority of the cable corridor routes to Dungeness Substation are within the SSSI boundary.

Mineral extraction sites and mineral safeguarding areas

- 18.3.5. The information that has been reviewed to date has not identified any operational mineral extraction sites within the study area.
- 18.3.6. A number of recorded historical mineral extraction pits are present off-Site boundary, but within 250m of the Site boundary. These are mainly listed as having ceased operation, with one being listed as dormant. The minerals extracted included 'sand and gravel', 'gravel' and 'shingle'.
- 18.3.7. There is further evidence of historical mineral extraction within the study area shown on the historical plans, but this does not appear to have extended to within the Site boundary. Widespread gravel extraction has occurred historically adjacent to the cable corridor search areas.
- 18.3.8. Mineral safeguarding areas are located across large parts of the Study area, as identified on mapping provided in the Kent Minerals and Waste Local Plan 2024-2039⁵²⁷ (map shown on page 187), designated to safeguard Storm Beach gravel. Within the small section of the Site boundary that is located within East Sussex County Council, the land is categorised as a key aggregate resource (relating to the same Storm Beach gravel deposits)⁵²⁸.

Geology

- 18.3.9. The bedrock geology across the Site boundary is composed of the Hastings Beds, which comprises ferruginous sandstones, siltstones and shales.
- 18.3.10. The superficial geological units across the Site boundary include alluvium, blown sand, storm gravel beach deposits, marine beach deposits and tidal flat deposits.

⁵²⁷ Kent Minerals and Waste Local Plan 2024-2039 available at:
https://www.kent.gov.uk/_data/assets/pdf_file/0019/205507/Kent-minerals-and-waste-local-plan-2024-to-2039.pdf

⁵²⁸ East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan 2013, available at:
<https://www.eastsussex.gov.uk/planning/waste-minerals-plans-monitoring-reports>

- 18.3.11. Made ground is potentially present in localised areas associated with mineral extraction sites, farm buildings or tracks, but there is no indication that extensive areas of artificial ground would be present. There are no mapped areas of artificial ground shown on the BGS map database.
- 18.3.12. An initial review of BGS borehole records has been undertaken, and these are in agreement with the recorded geological succession. Depths to the Hastings Beds bedrock are typically greater than 30m below ground level (bgl).

Hydrogeology

- 18.3.13. The bedrock deposits underlying the Site boundary form a secondary A aquifer, with superficial geological units defined as mainly secondary A aquifers, with some secondary aquifers (undifferentiated). A secondary A aquifer is defined as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important source of base flow to rivers.
- 18.3.14. The bedrock aquifers are defined as being of low vulnerability, with the superficial units being either high or moderate vulnerability.
- 18.3.15. Depth to groundwater is unconfirmed, but it would be expected that saline intrusion of groundwater is likely, due to the proximity to the coast.
- 18.3.16. A series of groundwater Source Protection Zones (SPZs) are present to the east of Lydd, through which some sections of the proposed cable routes pass. This predominantly effects SPZ 3 (total catchment zone), but some short sections of cable route pass through SPZ 1 (inner protection zone) and SPZ 2 (outer protection zone).

Discharge consents

- 18.3.17. There are several discharge consents located within the Site and within 250m of the Site boundary.

Historical site usage

- 18.3.18. Historical mapping shows most land within the Site boundary was used for agricultural purposes from the earliest map editions (1846), being subdivided into small and medium-sized fields, with tracks, drains, paths and named sewers marked on the mapping. Other on-site features include farm buildings, numerous small ponds, areas marked as infilled land, overhead electricity lines and an electricity substation (within South Brooks F). In some areas, the tracks or paths that are present appear to have been built up slightly (particularly in the eastern areas). Since the earliest historical mapping (from around the 1850s), the Site boundary has undergone little significant change.
- 18.3.19. Features of note on land outside the Site boundary, but within the study area include London Ashford Airport, Dungeness A and B Nuclear Power Station,

Dungeness Substation at the southern extent of the cable corridors, buildings around Dungeness (including a building labelled as 'Experimental Station', which was a research facility for lighthouse technology, located to the south east of the current lighthouse; and various cottages), railway lines and farm buildings.

Landfill sites and waste transfer sites

- 18.3.20. No licensed active waste management facilities or landfill sites are recorded within the Site boundary. There are no historical landfill sites within the Site boundary. There are several off-Site boundary landfills or waste sites within 250m of the Site boundary.

Land contamination

- 18.3.21. The Site boundary history indicates that land use has been primarily agricultural within the Site boundary, with London Ashford Airport located outside the Site boundary (but within the study area) between Lydd and Greatstone-on-Sea. Railway tracks, and the routes of former railways, are present within the study area. There are areas of possible reclaimed land and artificial ground in the wider area, some of which appear to be present within the Site boundary and study area.
- 18.3.22. Contamination may be present on-site associated with agricultural land use or off-site aviation uses, or the railway. Made ground may be present in limited locations within historical mineral extraction sites or infilled ponds, along tracks (particularly if they were built up above the surrounding ground level) and close to farm buildings located within the Site boundary. There is the potential for asbestos-containing materials to be present if made ground deposits are identified.
- 18.3.23. No significant pollutions incidents within the Site boundary or study area have been recorded in the last 10 years.
- 18.3.24. Unexploded ordnance (UXO) risk is considered further in **Chapter 19: Environmental Topics Scoped Out**.

Natural geological hazards

- 18.3.25. According to the environmental database information, there is the potential for risks from geological hazards within some sections of the Site boundary, as follows:
- Running sand hazards: some areas of high hazard, some of moderate hazard, and zones of no hazard;
 - Landslide hazards: hazards not considered to be likely;
 - Ground dissolution hazards: soluble rocks are present, but unlikely to cause problems except under exceptional conditions; and

- Compressible ground hazards: mostly no hazard is likely, but in a small area hazards are possible.

18.3.26. There are not considered to be hazards with respect to shrink/swell of clay deposits or collapsible ground hazards.

Important Receptors Identified

18.3.27. The key receptors of relevance to the land and groundwater assessment are as follows:

- Dungeness, Romney Marsh and Rye Bay SSSI where the Site boundary overlaps with the SSSI boundary;
- Mineral resources;
- Secondary A aquifer in bedrock unit and secondary A aquifers and secondary undifferentiated aquifers in superficial deposits).

18.4. Environmental Measures

18.4.1. Consideration would be paid to the opportunity to introduce environmental measures that would help to avoid or reduce the potential for an adverse significant effect to occur. In accordance with Schedule 4(7) of the EIA Regulations, the ES would be based on an EIA mitigation hierarchy which seeks to avoid, prevent, reduce and offset (where appropriate) likely significant effects. Specific environmental measures relevant to land and groundwater would be identified and would be considered as part of the assessments (i.e. the assessments of likely significant effects have been undertaken with the inclusion of the environmental measures, as these measures would form part of the Proposed Development). At this stage of the project, the following environmental measures would be implemented and included within the Proposed Development

Construction

18.4.2. An Outline Construction Environmental Management Plan (oCEMP) would be submitted in support of the DCO Application, which would detail and secure the following measures to ensure that damage to land and groundwater can be avoided or minimised during the construction phase (it should be noted that these are selected examples, and not a full list of measures):

- If identified by a Preliminary Risk Assessment (PRA), undertake a ground investigation prior to construction commencing so that any contamination associated with historical Site boundary uses present within the ground is identified and appropriate mitigation measures are applied to avoid impacts;
- Adhere to best practice measures such as containment measures for fuel, oils and chemicals (drip trays, bunding or double-skinned tanks for fuels and oils, storing chemicals in accordance with Control of Substances

Hazardous to Health (COSHH) guidelines, provision of spill kits in areas of fuel and oil storage);

- Have designated areas for delivery and refuelling;
- Include an emergency response plan to cover accidental spillage/leak events;
- Include a procedure for actions required if unexpected contamination is encountered during works (to include actions required for any asbestos containing materials);
- Discharge water removed from excavations appropriately, subject to relevant permits (if required);
- Manage dust at the Site boundary to ensure no airborne contamination migrates to adjacent land; and
- If piling would be involved in any aspects of the construction works, a piling risk assessment would be prepared.

Operation

- 18.4.3. An Outline Operational Environmental Management Plan (oOEMP) would be submitted in support of the DCO Application which would detail and secure the measures to ensure that damage to land and groundwater can be minimised during the operation phase.

Decommissioning

- 18.4.4. An Outline Decommissioning Environmental Management Plan (oDEMP) would be submitted in support of the DCO Application which would detail and secure the measures to ensure that damage to land and groundwater can be minimised during the Decommissioning phase.

18.5. Scope of the Assessment

Consultation Undertaken to Date

- 18.5.1. No direct consultation regarding land and groundwater has been undertaken to date. Further information on consultation completed to date for the Proposed Development is detailed in Section 5.5 of **Chapter 5: Approach to EIA**.

Assessment Methodology

- 18.5.2. A walkover survey of the Site boundary would be undertaken as part of the baseline assessment relating to land and groundwater.
- 18.5.3. As detailed in Table 18.1, potential effects have been scoped out from detailed assessment. A Preliminary Risk Assessment (PRA) report would be prepared in support of the DCO application to provide a desk-based analysis of the Site boundary.

Effects Scoped Out from Detailed Assessment

- 18.5.4. Table 18.2 presents the land and groundwater matters that are unlikely to result in significant effects and which are, therefore, proposed to be scoped out from the detailed assessment.

Table 18.1 Effects Scoped Out from the Detailed Assessment

Potential Effect	Rationale to be Scoped Out
Effects on the geological elements of Dungeness, Romney Marsh and Rye Bay SSSI during construction, operation and decommissioning	The geology underlying the Site boundary comprises bedrock units of sandstones, siltstones and mudstones (Hastings Beds) with superficial units including tidal flat deposits and storm beach deposits. The Dungeness, Romney Marsh and Rye Bay SSSI is designated for both biological and geological reasons. The SSSI is partially within the Site boundary but none of the solar PV areas are within the SSSI. Most of the proposed underground and overhead cable corridor search areas are covered by the SSSI designation, along with a section of land within South Brooks A that is intended for environmental mitigation and enhancement (with the land possibly being required for cables and/or access). As stated in the Geological Conservation Review Site boundary report⁵²⁹ for the SSSI, the reason for the designation is that the area includes the best UK example (and one of the best in the world) of 'cusate foreland' (a triangular-shaped headland, locally known as a 'ness', the form of which evolves over time due to the actions of the sea and other factors). The area of the SSSI at Dungeness incorporates the onshore evidence of historical coastline formation (with both exposed and buried shingle areas), in the shape of numerous flint shingle ridges, extending both northwards and westwards inland from the current point of the headland. The SSSI includes around 1,258ha of exposed shingle, and 1,150ha of buried shingle banks. The site contains coastal geomorphological features up to around 5,500 years old. The depths of material present over the buried areas of shingle ridges are not definitively recorded, but is expected to be shallower near the coastline, increasing in depth further from the sea. The total length of cable route that would be required has not yet been confirmed. However, only one section would be required, which would run from the main solar PV areas to Dungeness substation.

⁵²⁹ Geological Conservation Review site report for Dungeness, Romney Marsh and Rye Bay SSSI available online at: <https://jncc.gov.uk/jncc-assets/GCR/gcr-site-account-2771.pdf>

Potential Effect

Rationale to be Scoped Out

Small sections of the underground and overhead cable search areas are located within the SSSI, and the type of work that would be involved in the Proposed Development, and the minor size of the area involved (compared to the large extent of the SSSI) means that construction, operation, and decommissioning of the Proposed Development would not be expected to result in a significant effect on the SSSI, taking into account suitable embedded mitigation and additional mitigation measures.

During construction, the structure of geological units would be affected in locations where excavation is necessary (including trenches for cables, and foundations for buildings, if any are required within the boundaries of the SSSI), and where piles are installed. In areas of solar arrays, the standard method for installing these uses either galvanized steel posts or screw piles driven into the ground. The pile depth for these mounting structures would be up to 3m under standard conditions. In areas where ground penetration foundations are not feasible, reinforced concrete ballast foundations would be used.

Because the shingle ridges are buried more deeply further inland, it would be expected that the trenching works and pile installation works would affect the physical structure of the geological units to a greater degree nearer the coast, and a lesser degree further inland. On this basis, it would be expected that any construction works that are required within the SSSI boundary (for cables or access routes) would be minimised by careful route selection to reduce the need for intrusive construction works as far as possible. No additional effects would occur during the operation phase. During decommissioning, the removal of surface infrastructure, and infrastructure within the upper 1m of the surface, would potentially have minor effects on the physical structure of geological units, depending on the construction technique adopted.

Given that the important units are all buried features, there is no issue with restricting or losing access to the geological units, as they are not currently accessible. There are no above-ground exposures that would be damaged or affected. Data obtained from project-specific ground investigation work would be shared with Natural England to provide greater understanding of the extent and features of the geological SSSI. Any specific requirements for cable trenches and access routes within the SSSI boundary would also be agreed with Natural England, based on selecting approaches that would minimise impacts on the geological units. This could include the requirement that where any trenching or excavations are needed that potentially effect the designated geological units, any imported backfill material would be distinct from the excavated material and other sediments on-Site

Potential Effect	Rationale to be Scoped Out
	boundary, to prevent confusion with material that is naturally present on-Site boundary. As any measures to protect the physical structure of the geological units can be addressed by agreeing an approach that is acceptable to Natural England, it is considered that this matter can be scoped out from detailed assessment. Whilst the importance of the matter is recognised, it is felt that the potential impacts can be minimised by careful consideration of positioning of infrastructure, and by minimising routes of cables and access tracks within the SSSI, as well as by adhering to agreed mitigation in respect of the cable trenches and access tracks, in consultation and agreement with Natural England. In regard to the underground and overhead line cabling search areas, one of the cable options includes an overhead element, rather than buried cables, which would have a lower impact on any ground-based features. Matters related to contamination are addressed under 'Land (potential contamination)' below.
Effects on mineral resources during construction, operation and decommissioning	There are mineral safeguarding areas within the Site boundary and study area. However, these safeguarded minerals are also designated as important geological units in terms of the Dungeness, Romney Marsh and Rye Bay SSSI (as discussed above). Therefore, it is considered unlikely that any significant quantities of these units would be approved for extraction by Kent County Council. As a result, it is proposed that an assessment of mineral safeguarding issues be undertaken and presented in the form of a Mineral Safeguarding Assessment to Kent County Council for discussion, in advance of submitting the DCO Application, to confirm the absence of likely significant effects. The Mineral Safeguarding Assessment would be submitted in support of the DCO Application.
Effects of potential contamination during construction, operation and decommissioning	Potential contamination associated with the Site boundary would be considered in detail within the Preliminary Risk Assessment (PRA), which would be prepared for and submitted in support of the DCO Application. However, a preliminary review of the available data has shown that historical and current potentially contaminative uses of the Site boundary and the land within the study area have been restricted to agricultural land use, with some small areas where infilled land may be present, and locations of disused railways and an airfield (both off-Site boundary). Dungeness Power Station is located close to the

Potential Effect	Rationale to be Scoped Out
	south end of the underground and overhead line cable search areas (Shown in Figure 2.1 within Appendix E). Based on this information, significant contamination is not expected to be present. Any issues associated with potential contamination within the Site boundary would be comprehensively assessed by the PRA in line with national guidance, and by subsequent ground investigation (the scope of which would be determined based on the findings of the PRA and agreed with Kent County Council). Any existing contamination that is identified by the ground investigation would then be required to be assessed, and if appropriate, remediation and verification plans would be agreed with Kent County Council. Any necessary remediation would be undertaken prior to construction (potentially in a phased manner, if appropriate), and this approach would ensure that there are no resultant significant effects on any sensitive receptors relating to contamination of land and groundwater. There are not anticipated to be any impacts on the Proposed Development during operation or decommissioning as a result of existing contamination, as any relevant issues would have been identified and resolved prior to construction commencing. Any issues relating to contamination resulting from project activities would be controlled by the requirements of the oCEMP, oOEMP and oDEMP, all of which would be submitted in support of the DCO Application (e.g., issues relating to storage and use of fuels). These documents would also address the potential for the Proposed Development to affect existing contamination, or be affected by existing contamination, including emergency response procedures.
Effects on groundwater during construction, operation and decommissioning	The groundwater in bedrock deposits underlying the Site boundary is a secondary A aquifer, and in superficial geological units it is either a secondary A aquifer or secondary aquifer (undifferentiated). Sections of the proposed cable corridor routes pass through Source Protection Zones. The quality of groundwater would be appropriately protected by mitigation measures detailed in and secured by the oCEMP, oOEMP and oDEMP, all of which would be submitted in support of the DCO Application. These mitigation measures, such as emergency procedures to manage accidental spillages and leaks and procedures to mitigate against contaminated land, are appropriate for protecting groundwater of the highest sensitivity, and would be adhered to across all areas of the Site boundary, regardless of whether the groundwater quality is of the highest sensitivity, or of lower quality.

Potential Effect	Rationale to be Scoped Out
	The oCEMP, oOEMP and oDEMP would provide the details of strategies to cover: • Pollution incident control; • Emergency preparedness; • Construction site security; and • site materials and waste management. If piling is required to facilitate the construction of the Proposed Development (as determined by the engineering design and the ground conditions that are present), the need for a piling risk assessment would be discussed and agreed with Kent County Council, prior to construction commencing. This would ensure that any potential risks to groundwater from piling operations are avoided, minimised and managed appropriately (information to be collected during the ground investigation would be required to feed into this risk assessment). It is also acknowledged that changes to the surface water regime could have a negative impact on the groundwater underlying the Site boundary (with respect to both groundwater quality and quantity/flow levels), and this is addressed by ensuring that industry best practice is adhered to with respect to protection of surface waters (as detailed in and secured by the oCEMP, oOEMP and oDEMP). This would ensure that any adverse effects to surface waters are minimised, reducing the potential for corresponding changes within the groundwater.

Assumptions and Limitations

- 18.5.5. To ensure transparency within the EIA process, the following difficulties and uncertainties have been identified:
- On-Site boundary history data has been obtained from publicly available historical maps, and there may be developments that occurred between map editions that are not evident. This is a standard limitation, and any repercussions from this are limited, as it is often clear from field boundaries, positions of watercourses, etc, that no changes are likely to have occurred;
 - No intrusive Site boundary survey data were available to inform this EIA Scoping Report, but this information would be made available as the works associated with the Proposed Development progress, and would be incorporated into the detailed technical assessment where possible, to ensure that the Proposed Development does not result in significant adverse effects on land or groundwater receptors; and
 - The locations of any private water abstractions (licensed or unlicensed) have not been reviewed at this stage.

19. Environmental Topics Scoped Out

19.1. Introduction

- 19.1.1. There are a number of environmental aspects which are proposed to be scoped out of the Environmental Statement. This is because it is considered that there can be no significant effects occurring to any receptor for these aspects. In accordance with PINS Advice Note Seven⁵³⁰, the following sections set out each of the aspects that it is proposed are scoped out of the detailed assessment, with justification provided on why this is the case. This detail is presented in Table 19.1 below. Further supporting information has been provided within **Appendix C**, regarding specific environmental aspects from technical disciplines which are proposed to be scoped out of the EIA, in line with supporting guidance⁵³¹.

⁵³⁰ Planning Inspectorate (2025) Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements [Online] available at: <https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an>

⁵³¹ Planning Inspectorate (2025) Nationally Significant Infrastructure Projects: Technical Advice Page for Scoping Solar Development [Online] available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-technical-advice-page-for-scoping-solar-development#example-of-how-the-information-in-the-solar-scoping-table-should-be-applied>

Table 19.1 Technical Aspects Scoped Out

Technical Aspect	Justification
Glint and Glare	Solar PV modules are specifically designed to absorb light rather than reflect it. Solar PV modules are dark in colour due to their anti-reflective coatings and are manufactured with low-iron, ultra-clear glass with specialised coatings and textures to enable maximum absorption. The combination of these factors significantly increases electrical energy production of the panels and significantly reduces reflected rays at the same time. There are limited guidelines which set out a particular methodological approach to delivering a glint and glare assessment. National Policy Statement (NPS) for Renewable Energy Infrastructure (EN-3) in Sections 2.10.102 - 2.10.106, and the Draft NPS (EN-3) Sections 2.10.94 – 2.10.98 state that: <i>“Solar panels are specifically designed to absorb, not reflect, irradiation. However, solar panels may reflect the sun’s rays at certain angles, causing glint and glare. Glint is defined as a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel. Glare is a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel. The effect occurs when the solar panel is stationed between or at an angle of the sun and the receptor.</i> <i>Applicants should map receptors qualitatively to identify potential glint and glare issues and determine if a glint and glare assessment is necessary as part of the application.</i> <i>When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors, and provide an</i>

Technical Aspect	Justification
	<i>assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection.</i> <i>The extent of reflectivity analysis required to assess potential impacts will depend on the specific project site and design. This may need to account for ‘tracking’ panels if they are proposed as these may cause differential diurnal and/or seasonal impacts.</i> <i>When a glint and glare assessment is undertaken, the potential for solar PV panels, frames and supports to have a combined reflective quality may need to be assessed, although the glint and glare of the frames and supports is likely to be significantly less than the panels.”</i> National Policy Statement for Renewable Energy Infrastructure (EN-3) Footnote 93 states that: <i>“Most commercially available solar panels are designed with anti-reflective glass or are produced with anti-reflective coating and have a reflective capacity that is generally equal to or less hazardous than other objects typically found in the outdoor environment, such as bodies of water or glass buildings.”</i> In accordance with the Planning Inspectorate’s Technical Advice Page for Scoping Solar Development⁵³¹, it is proposed to exclude glint and glare as a chapter within the ES and instead produce a stand-alone glint and glare report, which would be appended to the ES submitted in support of the DCO Application. However, a description of any relevant proposed mitigation measures and safety considerations of the Proposed Development would be included within the Proposed Development description chapter of the ES. Furthermore, if any significant glint and glare effects are identified (for example, on public rights of way (PRoW) or roads), these would be considered within the relevant individual environmental aspect assessment chapter(s), such as Landscape and Visual or Transport and Access.

Technical Aspect	Justification
	The detailed stand-alone glint and glare assessment would consider ground-based (roads, rail, buildings, bridleways and PRow) and aviation (Air Traffic Control Towers, aircraft approach paths, and other relevant manoeuvring routes) receptors. Detailed geometric analyses would be undertaken using a bespoke glint and glare model for all receptors potentially affected by the Proposed Development. The outputs of the assessment would inform the design development and landscape mitigation strategy. From a technical perspective, there is no maximum distance at which potential reflections are considered significant. The significance of a reflection, however, decreases with distance because the proportion of an observer's field of vision that is taken up by the reflecting area diminishes as the separation distance increases. Terrain and shielding by vegetation are also more likely to obstruct an observer's view at longer distances. The above parameters and professional judgement, consistent with the approach taken in other solar DCOs, show that consideration of receptors within 1km of panel areas is appropriate for assessing glint and glare effects on ground-based receptors. Therefore, building receptors, major national/regional roads, PRowS and bridleways identified within 1km of the Site boundary would be considered as sensitive receptors. Local roads are typically excluded from the assessment as their level of traffic is likely to be relatively low, and any solar reflections experienced by a driver would be considered of low significance in the worst case. The limited guidance on glint and glare effects to aviation receptors does not specify a maximum distance within which effects need to be considered. However, in practice, aviation users and operators are most often concerned with developments within 10km of a licensed airport. This is based on requests for modelling by aviation users and operators at ranges of 10-20km being far less common, and the effects of glint and glare at these distances are

Technical Aspect	Justification
	expected to be of limited significance. Therefore, any airfields or airports within 10km of the solar PV modules would be considered. Aviation receptors at Lydd Airport (formerly Lydd Ferryfield Airport), located within 100m of the Site boundary, would be included within the technical assessment, and the Applicant is engaging with Lydd Airport regarding Glint and Glare effects as well as taking into account aerodrome safety. The assessment would consider the Air Traffic Control Tower, the paths of approach for landing, as well as other relevant manoeuvring routes. The approach phase (arrival flight paths) would be assessed as this is deemed to be the most sensitive phase of a flight. Departing aircraft would have the nose pointing upwards and the visibility of objects (i.e., reflective panels) located on the ground would be significantly reduced due to vertical field of view restrictions and cockpit obstruction. Therefore, departure paths would not be modelled. Aviation activity at other aerodromes would be considered at a high-level without technical modelling, due to the distance from the Site boundary. The next closest aerodrome to Lydd Airport is Bonnington Airstrip, approximately 11km to the north of the Proposed Development. Any potential effects towards the ground-based infrastructure (roads and buildings) can likely be solved with relatively simple mitigation strategies – the most common being the provision of screening (e.g. vegetation) at the Site boundary to obstruct views of potentially reflecting panels. Where views of reflecting panels are obstructed, no effects can be experienced. Other solutions such as layout or tilt/orientation modification can be considered to reduce effects but are rarely required in practice for ground-based receptors. Whilst formal guidance within the UK for quantifying effects is limited, the industry standard is to evaluate effects on aviation receptors based on their size and intensity of effect (specifically the potential for a temporary after-image) as well as their duration and operational sensitivity.

Technical Aspect	Justification
	Any “significant” effects identified through the process of modelling within the impact assessment would be mitigated. Where appropriate, evaluation of effects, duration, and the origin of the glare is considered. Technical mitigation options for aviation receptors can involve modifications to the panel configuration including varying the vertical tilt, azimuth angle and panel footprint.
Material Assets and Waste	The main impacts (changes) and effects (consequences) of materials consumption and waste disposal are derived from the IEMA Guide (2020)⁵³². Material assets and waste is proposed to be scoped out of the assessment for the following reasons: • The indirect impacts associated with materials consumption and waste disposal (e.g. release of greenhouse gas emissions, water consumption, amenity impacts, ecological impacts, etc) would be assessed elsewhere within the EIA (including Chapter 6: Biodiversity, Chapter 11: Landscape and Visual Amenity, Chapter 12: Transport and Access, and Chapter 13: Carbon and Climate Change). Similarly, the indirect impacts of any off-Site boundary waste management facilities and material production facilities are expected to be assessed (and where necessary, mitigated) under the planning and permitting regime for those sites and thus do not form part of an EIA for a development that uses such facilities for material supply or waste management;

⁵³² Institute of Environmental Management and Assessment (2020) Materials and Waste in Environmental Impact Assessment. Available online: <https://www.iema.net/media/0t5fwyhj/iema-materials-and-waste-in-eia-march-2020.pdf>

Technical Aspect	Justification
	• The Applicant is committed to undertaking a pre-construction site investigation which would confirm the need (or otherwise) to remove some soils for treatment or disposal if found to be contaminated and not practical to treat on-site. This Site boundary investigation would be secured within the Outline Site Waste Management Plan (oSWMP). Where there is found to be a need, measures to address this would be implemented and secured by the oSWMP, which would be submitted in support of the DCO Application. The commitment to provide an oSWMP is set out within the commitments register. • The waste hierarchy⁵³³ would be followed during construction, operation and decommissioning of the Proposed Development. It is not expected that the Proposed Development would result in significant amounts of waste being sent to local landfill sites. However, local landfill capacities would be considered and discussed in the oSWMP, which would be submitted in support of the DCO Application. • It is not intended that borrow pits would be used during construction of the Proposed Development. This would be outlined in the Commitments Register, which is located within Appendix B of this EIA Scoping Report. • It is not intended to remove significant quantities of excavated arisings from the Site boundary during construction (there are currently no demolition works proposed, for example). There may, however, be a need to remove some soils from the Site boundary for treatment or disposal, if found to be contaminated, and it is

⁵³³ His Majesty's Government (2013) The Waste and Electronic Equipment Regulations (Statutory instrument no. 3113, (2013)) [online] available at: <https://www.legislation.gov.uk/uksi/2013/3113/contents>

Technical Aspect	Justification
	not practical to treat this on-Site boundary. However, where possible, material would be balanced through a cut and fill exercise to retain volumes on-site. Mitigation measures detailed in and secured by the oCEMP and oSWMP, both of which would be submitted in support of the DCO Application, would demonstrate how a cut and fill balance shall be achieved. • For the operation phase, the potential streams and volumes of operational materials and waste disposal would be described within The Proposed Development chapter of the ES. There would be relatively little waste produced during the operational phase and the requirement for material assets would be limited to maintenance and replacement parts, as required. The ES would provide details on the replacement schedule and maintenance requirements, which would be based upon an indicative design life which would be assessed as part of the technical chapters. • Details of operational waste management measures for the Proposed Development would be detailed in and secured by the Outline Operational Environmental Management Plan (oOEMP) and oSWMP, both of which would be submitted in support of the DCO Application. These measures would aim to reduce the waste produced during the operation phase and the requirement for material assets would be limited to maintenance and replacement parts, as required. • The service life of the Proposed Development components would be outlined in the Proposed Development chapter of the ES and would also be considered in other relevant assessment chapters of the ES. The measures that would be put in place to facilitate these components being diverted from the waste chain would be detailed in and secured by the oSWMP, which would be submitted in support of the DCO Application.

Technical Aspect	Justification
	During decommissioning, the removal of any material assets and waste would be recycled or disposed of in accordance with good practice and market conditions at that time. If items can be recycled, this would be the first-choice option. The impacts of waste during the decommissioning phase would be managed and mitigated through measures detailed in and secured by the Outline Decommissioning Environmental Management Plan (oDEMP) and the oSWMP, both of which would be submitted in support of the DCO Application. The Decommissioning Environmental Management Plan (which would be required to be in substantial accordance with the oDEMP), would be approved by the host local planning authority at the time of decommissioning to ensure any impacts on waste arising at this stage are considered and mitigated.

Major Accidents and Disasters

‘Accidents’ are considered to be an occurrence resulting from uncontrolled events in the course of construction and operation of a development (e.g. major emission, fire or explosion). ‘Disasters’ are considered to be naturally occurring extreme weather events or ground related hazard events (e.g. subsidence, landslide, earthquake).

Given the nature and type of development, it is considered that the Proposed Development is unlikely to result in any type of major accident/ disaster. There is a strict legislative framework in the UK developed from the Building Act 1984⁵³⁴ regarding technical standards on health and safety, and also through the Construction (Design and Management) Regulations 2015⁵³⁵ to

⁵³⁴ His Majesty’s Government (1984), Building Act 1984 [online] available at: <https://www.legislation.gov.uk/ukpga/1984/55>

⁵³⁵ His Majesty’s Government (2015), The Construction (Design and Management) Regulations 2015 [online] available at: <https://www.legislation.gov.uk/uksi/2015/51/contents>

Technical Aspect	Justification
	ensure measures are measured through a project lifecycle, that governs construction activities to ensure risks are clearly managed to an acceptable level. A variety of guidance, including to ensure pollution prevention, also exists. Bearing all these in mind, an outline Construction Environmental Management Plan (oCEMP) would be submitted as part of the DCO application prior to construction commencing, that would detail the measures that would be implemented to ensure that major accidents are avoided. The Proposed Development would be designed and operated in accordance with all legislative requirements that relate to this type of facility. As discussed in Chapter 3: The Proposed Development, a management plan for battery safety would be prepared and submitted with the DCO Application. This plan would detail the regulatory guidance reviewed and how these would be responded to, so as to ensure that safety concerns around the BESS element of the Proposed Development are addressed. During operation, safety processes would be reviewed, and if required, updated to ensure that the operations do not increase the risk or result in a major accident. The location of the Site boundary is outside of an area where natural disasters have historically occurred. It is not an area at high risk from major earthquakes or subsidence, or because of the Site boundary's flat nature, likely to suffer from landslides. Parts of the Site boundary are located within Flood Zones 2 and 3 indicating a medium to high risk of flooding. However, the Proposed Development including the way it is constructed and operated, is being designed to withstand any flooding should it occur. Further information is available within Chapter 7: Hydrology of this Scoping Report. Furthermore, the infrastructure associated with solar is considered of low susceptibility to the impact of natural disasters. There is limited potential for a disaster occurring at a solar farm to

Technical Aspect	Justification
	create a hazardous pollution risk, with limited need for hazardous substances in solar farm operation. In regard to the potential for Aircraft disasters and rail accidents, the potential for glint and glare to affect aircraft and rail users would be considered within the glint and glare assessment which would be appended to the ES. In regard to the risk from Unexploded Ordnance (UXO), finds have been recorded within and in proximity to the Site boundary following a review of desk-based data, which indicates a moderate UXO hazard level across South Brooks A-E, and a low UXO hazard level within South Brooks F. To manage this potential effect, non-intrusive UXO surveys would be undertaken prior to any excavation and shallow piling works, to identify specific UXO to be avoided where practicable, or investigated and removed by qualified professionals. The potential for impacts during construction would be considered and mitigated through measures which would be included within the outline Construction Environmental Management Plan (oCEMP), such as the provision of formal UXO awareness briefings for all Site boundary staff to offer UXO recognition skills, and the actions required if UXO is encountered. As a result, it is considered that there can be no significant effect as a result of major accidents and disasters and as such it is scoped out of detailed assessment.
Heat and Radiation	Heat and Radiation has been considered within EIA through its introduction via the 2017 update to the EIA regulations, to which Schedule 4(5)(c) states an ES should include: <i>“A description of the likely significant effects of the development on the environment resulting from, inter alia:</i>

Technical Aspect	Justification
	<i>(c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste.”</i> Due to the scale and nature of the Proposed Development, it is not anticipated that there would be any significant sources of heat or radiation during either construction, operation or decommissioning. With regard to potential cables, the typical distance estimates of measurable changes in temperature are at most between 1 and 1.5m from any potential cables, thus making any potential effect highly localised. It is therefore proposed to exclude heat and radiation from the scope of the EIA. The ES would provide further details on how sources of heat and radiation have been considered in respect of Site boundary selection, design and any applicable mitigation measures.
Electric, magnetic and electromagnetic fields (EMF)	Electric fields are produced by voltage, which is the pressure behind the flow of electricity, and the nature of the electric fields depend on the operating voltage of the equipment. Magnetic fields are produced by current, which is a measure of the flow of electricity. In regard to biodiversity, EMF from buried cables during operation can result in environmental changes in close proximity to cables through soil heating (altering habitat composition) and magnetic fields discouraging certain species from moving through the area. However, cabling for solar farms is no different to those already in position across the country (e.g. connections for other electricity generating stations, parts of the national grid and distribution networks and other solar farms) that may have no effect on ecological features. Heating of the soil would occur over a small area only, and is considered in the Heat and Radiation section above.

Technical Aspect	Justification
	Electrical fields can also be blocked by fences, shrubs and buildings, and the intensity of the electric and magnetic fields decreases from the source. The majority of the Proposed Development would utilise 132kV underground cabling, aside from the 400kV cabling required to connect the proposed on-site substation(s) to the Dungeness Substation, to which underground and overhead options are being considered. The Department for Business, Energy and Industrial Strategy (BEIS) guidance, alongside the 1998 guidelines published by International Commission on Non – Ionizing Radiation Protection (ICNIRP) states that underground cables and overhead power lines at voltages up to and including 132 kV are not capable of exceeding the ICNIRP exposure guidelines. As detailed within section 2.11.9 of the NPS EN-5 and 2.11.10 of the draft NPS EN-5, should the Proposed Development include an overhead line, the Applicant must ensure that the proposal is in accordance with the ICNIRP guidelines. The proposed cable routes would be designed to be compliant with the Electricity Safety, Quality and Continuity Regulations 2002. Both the current and draft NPS EN-5 detail a decision tree for dealing with EMFs from overhead lines. Should overhead lines be required as part of the Proposed Development, information would be provided to determine that the overhead line complies with relevant policy tests. Therefore, and due to the relatively minimal amount of 400kV underground cabling required for the Proposed Development, no significant EMF effects are anticipated. The Proposed Development would be further guided by the design principles which include offsets to electrical infrastructure, residential properties, PRoW as well as ecological and hydrological receptors such as watercourses, thus avoiding the potential for EMF effects upon sensitive receptors. Design measures would be in compliance with ICNIRP public exposure

Technical Aspect	Justification
	guidelines, the factors to which are detailed within sections 2.10.11 – 2.10.13 of the NPS EN-5 and the draft NPS EN-5. It is therefore proposed to exclude EMF from the scope of the EIA. A standalone report for EMF would be produced for the Proposed Development and would be presented as part of the ES.
Wind Micro-climate	The potential for likely significant effects in relation to Wind Microclimate is generally assessed in respect of the Lawson Comfort Criteria. This criterion is a standard which can be used to evaluate the impact of the Proposed Development upon pedestrians and their safety if there potential changes to wind speed. The generation of significant Wind Microclimate effects is typically associated with taller developments in highly urbanised environments. Given the low-rise nature of the Proposed Development, off-Site boundary wind conditions are likely to remain broadly similar, and as a result the construction and operation of the Proposed Development is unlikely to negatively impact pedestrians whilst using local PRowWs, or lead to safety exceedances due to the on-site wind conditions remaining similar. As such no technical assessment of Wind Microclimate is considered necessary in respect of the Proposed Development and this aspect is scoped out of the EIA.
Lighting	Any lighting during the construction and decommissioning phases would be directional, temporary and only used during working hours. When used, lighting would be designed to minimise potential for light spillage beyond the Site boundary, particularly towards houses, roads and ecological habitats, in so far as it is reasonably practicable. To ensure there are no likely significant effects, control measures would be included within the outline Construction

Technical Aspect	Justification
	Environmental Management Plan (oCEMP) and outline Decommissioning Environmental Management Plan (oDEMP). During operation, the effect of lighting would be considered as part of technical discipline ES chapters, rather than as a standalone assessment, and would therefore be included in the description of effects on landscape character and visual amenity, as well as through the assessment of biodiversity.
Transboundary effects	Regulation 32 of the EIA Regulations requires the consideration of any likely significant effects on the environment of another European Economic Association (EEA) State. The consideration of transboundary effects is also detailed within PINS Advice Note Seven⁵³⁶ and further guidance detailed within specific advice upon transboundary impacts⁵³⁷. Due to the nature and location of the Proposed Development, it is not anticipated that the Proposed Development would lead to potential for any likely significant effects upon the environment of another EEA State. Therefore, a transboundary screening matrix has not been included within this Scoping Report.

⁵³⁶ Planning Inspectorate (updated March 2025) Advice Note Seven: Nationally Significant Infrastructure Projects - Advice Note Seven: Environmental Impact Assessment: process, preliminary environmental information and environmental statements [Online] available at:

<https://www.gov.uk/government/publications/nationally-significant-infrastructure-projects-advice-note-seven-environmental-impact-assessment-process-preliminary-environmental-information-an>

⁵³⁷ Planning Inspectorate (updated March 2025) Nationally Significant Infrastructure Projects: Advice on Transboundary Impacts and Process [Online] available at: <https://www.gov.uk/guidance/nationally-significant-infrastructure-projects-advice-on-transboundary-impacts-and-process>

Technical Aspect	Justification
Utilities	The Proposed Development has the potential to affect existing utility infrastructure located at the Site boundary. Given the nature of the Proposed Development, potential impacts to existing utility assets would be limited to the construction and decommissioning phases. To identify existing constraints, a utility search has been undertaken which covers the Site boundary as well as potential cable route options. The utility search identified assets within the Site boundary which would require careful consideration as the design of the Proposed Development evolves, including: • National Grid transmission lines; • Openreach British Telecommunications cabling; • Southern and Affinity Water pipelines; and • Network Rail utilities. Further consultation would be carried out with relevant utility companies to confirm the information drawn from the utility search is accurate and up to date. This information would be used to inform the layout of the Proposed Development and would be taken into account of in the relevant technical assessments, including archaeology as well as landscape and visual amenity. The outline Construction Environmental Management Plan (oCEMP) would include any additional mitigation measures to protect against interference with below ground utilities during construction. The Applicant would expect to agree protective provisions with each relevant

Technical Aspect	Justification
	utility owner, in order to ensure the DCO includes appropriate protections and restrictions on the Applicant's exercise of its powers for the protection of utilities. It is therefore not proposed to prepare a separate utilities chapter as part of the ES.



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